

# APCO Performance Summary

Company Name: COMSOL PTY LTD

Trading As: COMSOL PTY LTD

ABN: 48069997422

## About the APCO Annual Report & Performance

The score above and chart below indicate your organisation's overall performance in the 2023 APCO Annual Report. With your chosen reporting period of January, 2022 - December, 2022 you have achieved a **Beyond Best Practice** overall performance level.

1 Getting Started    2 Good Progress    3 Advanced    4 Leading    5 Beyond Best Practice

### Understanding APCO Annual Reporting performance levels:

- 1 Getting Started:** You are at the start of your packaging sustainability journey.
- 2 Good Progress:** You have made some first steps on your packaging sustainability journey.
- 3 Advanced:** You have taken tangible action on your packaging sustainability journey.
- 4 Leading:** You have made significant progress on your packaging sustainability journey.
- 5 Beyond Best Practice:** You have received the highest performance level and have made significant progress on your packaging sustainability journey.

### Packaging Sustainability Framework criteria

Criteria 1: **Governance & Strategy** This criteria considers actions to integrate packaging sustainability into business strategies.

Criteria 2: **Design & Procurement** This criteria considers actions taken to ensure that sustainability principles are considered in the design or procurement of both new and existing packaging through use of the Sustainable Packaging Guidelines (SPGs).

Criteria 3: **Recycled Content** This criteria considers actions taken to increase or optimise the amount of recycled material used by your organisation.

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Criteria 4:

**Recoverability**

This criteria considers actions taken to improve the recovery of packaging at end-of-life and increase use of reusable packaging.

Criteria 5:

**Disposal Labelling**

This criteria considers the extent to which packaging has been labelled to help consumers determine what to do with packaging at end-of-life.

Criteria 6:

**On-site Waste**

This criteria considers progress in increasing the amount of on-site solid waste being diverted from landfill.

Criteria 7:

**Problematic Materials**

This criteria considers the extent to which organisations are actively phasing out problematic and unnecessary single-use plastic packaging and preventing/reducing litter.

**APCO Annual Report Criteria Performance & Responses**

Provided below are your organisation's responses to the questions within the APCO Annual Report.

Criteria 1

**Governance & Strategy**

Does your organisation have a strategy that includes goals for packaging sustainability that addresses the Sustainable Packaging Guidelines (SPGs) or equivalent?

Yes  No

Supporting Evidence

Comsol has a sustainability department embedded within the business. A core part of the department's packaging focused directive is to evaluate packaging and collaborate with the design and manufacturing teams to ensure that packaging fulfils APCO's standards and is in line with the Sustainable Packaging Guidelines (SPGs). These two frameworks run side by side in the decision making process for Comsol and has allowed 100% of the retail packaging used to be fully recyclable, based on the Packaging Recycling Evaluation Portal, and fulfils the set criteria for the 10 SPGs.

*Your full response can be found towards the end of this document.*

Criteria 2

**Design & Procurement**

Do you use the SPGs to review your packaging?

Yes  No

Are you keeping records of the outcomes of your reviews using the SPGs?

Yes  No

Please provide an example of a positive outcome you have achieved.

We assess our data over more than 5 years of history in order to ensure accuracy about our sustainable transition that commenced in 2020. By gathering, sharing and utilising this statistical information, and by collaborating with our manufacturing teams in multiple ways, we aim to know and understand the materials we use for packaging to the highest possible level.

The results have highlighted that in the reporting period the new designs (and those out of legacy plastic) *Your full response can be found towards the end of this document.*

How many reviews did you conduct during the reporting period?

1

Supporting Evidence

- We use PowerBI to manage our data in combination with Netsuite. This combination of tools enables us to know and understand material flows in a data format.
- We have published this data in our 2023 Packaging Impact Report that provides data about this current APCO reporting period.
- We have an internal SPG checklist and criteria fulfilment process that is completed during each packaging

*Your full response can be found towards the end of this document.*

Criteria 3

Recycled Content

Do you have a policy or procedure to buy products and/or packaging made from recycled materials?

Yes  No

Does any of your packaging contain recycled materials?

Primary

Yes  No

Secondary

Yes  No

Tertiary

Yes  No

Supporting Evidence

Since 2018 Comsol has had a specific sustainable packaging policy and this has been heightened in focus by embedding a sustainability department within the business since 2021.

-See reference as Sustainable Packaging Policy 2018.

This focus enabled a transition away from unsustainable material to recycled content from this period. From 2018 when cardboard use was 85.1% and plastic was 6.96% the transition to 88.86% cardboard and 7.14%

*Your full response can be found towards the end of this document.*

## Criteria 4

**Recoverability**

Have you investigated the recoverability of your packaging to look for opportunities for greater reuse or recycling?

Yes  No

## Supporting Evidence

Packaging has remained compliant under APCO guidelines to the rating we gained from APCO in the previous reporting period. We have made minor adjustments to the product that have been added to the PREP tool in February 2023 to ensure that the packaging is still to standard - all SKUs are.

Our next steps in the process are due to be completed in the next reporting period, in July 2023, where our packaging size is due to decrease. However none of these areas will change the amount of reuse or

*Your full response can be found towards the end of this document.*

## Criteria 5

**Disposal Labelling**

Do you provide disposal information for your packaging on-pack?

Yes  No

## Supporting Evidence

All of our SKUs include the ARL on pack. In addition we have created a Sustainably Connected branding, illustrated on our website for reference, that contains additional packaging labelling to encourage correct use at the end-of-life based on providing information to consumers. Examples include our made with recycled cardboard, zero plastic and plant-based ink information,

We also promote similar actions off-pack as well, within our Closing The E-Loop education program, refer

*Your full response can be found towards the end of this document.*

## Criteria 6

**On-site Waste**

Do you have a system to collect and recycle used packaging generated at your facilities (e.g. office, warehouse etc.)

Yes  No

## Supporting Evidence

Throughout the reporting period Comsol collaborated with a resource recovery organisation for on site waste collection via skip bins, a soft plastic bale and a cardboard compactor.

For reuse, our warehouse team utilizes a process that reuses packaging boxes for outbound orders and

*Your full response can be found towards the end of this document.*

## Criteria 7

## Problematic Materials

Which of the following activities do you undertake to help reduce the impact of litter?

- Conduct regular clean-ups on-site
- Participate in Business Clean-Up Day
- Redesign packaging to eliminate components that may have the propensity to become litter
- Other (please specify)

Please specify

Comsol have created an electronic waste education program, Closing The E-Loop, in collaboration with Cleanaway's kNOw Waste education team.

This resource targets students in Stage 4 (years 7-8) and is aligned to the following NESA Geography syllabus outcome:

*Your full response can be found towards the end of this document.*

- None of the above

## Supporting Evidence

Similar to the earlier points on the other Criteria sections our packaging has phased out single-use plastic, particularly notable for blister pack type of lines and for sealer stickers (these products are now in recyclable cardboard boxes and all lines use paper stickers where there is a need to seal the units). The use of cardboard enables both reuse and recycling of retail, B2B and tertiary (transport) packaging.

*Your full response can be found towards the end of this document.*

## Additional Information

- No additional information

Please tell us about any innovative packaging sustainability initiatives you have implemented during your chosen 12 month reporting period.

No major changes occurred during this reporting period, they carried over from the original mass change and incorporation of the ARL on pack from the previous reporting period.

Please tell us of any constraints you may have had during your chosen 12 month reporting period that has impacted on your packaging sustainability initiatives and Covenant obligations.

None

## Full Open Responses

### Criteria 1 - Supporting Evidence

Comsol has a sustainability department embedded within the business. A core part of the department's packaging focused directive is to evaluate packaging and collaborate with the design and manufacturing teams to ensure that packaging fulfils APCO's standards and is in line with the Sustainable Packaging Guidelines (SPGs). These two frameworks run side by side in the decision making process for Comsol and has allowed 100% of the retail packaging used to be fully recyclable, based on the Packaging Recycling Evaluation Portal, and fulfils the set criteria for the 10 SPGs.

For additional in-house reference:

- Sustainable Packaging Policy PDF
- Sustainable Packaging Guidelines Comsol Actions PDF
- Power BI Dashboards (Current and Original Type ID Direct Comparison; Current and Original Type ID Unit Material Use and Forecast; Total Unit Material Use; Unit Sales Forecast; Unit Sales Impact Report 2023; Unit Sales and Weights for Product and Combined Packaging; Unit Sales Full Overview; Unit Sales Tertiary [Transport] Material Use; note that more dashboard capabilities exist outside of these documents to manage material use and supply chain flow)
- 2023 Officeworks Portfolio Packaging Impact Report; 2023 Klik B2B Portfolio Packaging Impact Report; 2023 Retail & B2B Portfolios Packaging Impact Report
- Best Standard Packaging Material Requests
- Packaging Material Certification Documents
- Comsol APC Plan Matrix 2019-2022 Word document
- Systems Thinking Approach PDF and PNG documents
- Letter from AM Evans PDF in reference to participation in the electronics stewardship roundtable
- Registration/membership with ANZPAC and ARL
- Sustainability Progress Report
- Sustainability papers and educational content including The Shift To Recycled Material For Electronic Products and our Closing The E-Loop education program that both contain information about APCO and the ARL.

### Criteria 2 - Please provide an example of a positive outcome you have achieved.

We assess our data over more than 5 years of history in order to ensure accuracy about our sustainable transition that commenced in 2020. By gathering, sharing and utilising this statistical information, and by

collaborating with our manufacturing teams in multiple ways, we aim to know and understand the materials we use for packaging to the highest possible level.

The results have highlighted that in the reporting period the new designs (and phase out of legacy plastic stock on hand) have reshaped our use of material.

In 2022, the current reporting period, the use of the material: cardboard 64,446 kg and plastic 4,957 kg. This is a huge shift from the use of 71% single use-material prior to the transition and highlights the move to 0% plastic use for all new orders in our Officeworks Retail Portfolio in 2022.

#### Criteria 2 - Supporting Evidence

-We use PowerBI to manage our data in combination with Netsuite. This combination of tools enables us to know and understand material flows in a data format.

-We have published this data in our 2023 Packaging Impact Report that provides data about this current APCO reporting period.

-We have an internal SPG checklist and criteria fulfilment process that is completed during each packaging review cycle, noted within the one review above. No additional reviews were required.

For additional in-house details refer to:

Email correspondence with suppliers and retail for inner trays, plastic hooks, blister packs were undertaken by the Director.

-Australian Recycling Label Example for Suppliers Excel and PNG

-Best Standard Packaging Material Requests Word document

-Sustainable Ink Excel

-Sustainable Packaging Policy 2018

#### Criteria 3 - Supporting Evidence

Since 2018 Comsol has had a specific sustainable packaging policy and this has been heightened in focus by embedding a sustainability department within the business since 2021.

-See reference as Sustainable Packaging Policy 2018.

This focus enabled a transition away from unsustainable material to recycled content from this period. From 2018 when cardboard use was 35.14% and plastic was 64.86% the transition to 92.86% cardboard and 7.14% plastic (all legacy stock on hand sales) is a key illustration of the effectiveness of this policy - no new orders in 2022 contained plastic, all were made from recycled cardboard/paper based material.

For additional evidence of the 2022 period please see below.

In house documents for reference include:

-Sustainable Packaging Policy PDF

-Sustainable Packaging Guidelines Comsol Actions PDF

-Power BI Dashboards (Current and Original Type ID Direct Comparison; Current and Original Type ID Unit Material Use and Forecast; Total Unit Material Use; Unit Sales Forecast; Unit Sales Impact Report 2023; Unit Sales and Weights for Product and Combined Packaging; Unit Sales Full Overview; Unit Sales Tertiary [Transport] Material Use; note that more dashboard capabilities exist outside of these documents to manage material use and supply chain flow)

-2023 Officeworks Portfolio Packaging Impact Report; 2023 Klik B2B Portfolio Packaging Impact Report; 2023 Retail & B2B Portfolios Packaging Impact Report

-Best Standard Packaging Material Requests

-Packaging Material Certification Documents

- Supplier Material Confirmation List Excel
- Email correspondence between suppliers and the Sustainability Department and Product and Design departments

#### Criteria 4 - Supporting Evidence

Packaging has remained compliant under APCO guidelines to the rating we gained from APCO in the previous reporting period. We have made minor adjustments to the product that have been added to the PREP tool in February 2023 to ensure that the packaging is still to standard - all SKUs are.

Our next steps in the process are due to be completed in the next reporting period, in July 2023, where our packaging size is due to decrease. However none of these areas will change the amount of reuse or recycling available for the packaging. All packaging can be reused by the consumer, for the storage of the products for instance, or easily recycled in the yellow lidded recycling bin because the packaging contains only cardboard and/or paper based material - simplifying the process for consumers.

For additional evidence of the 2022 period please see below.

In house documents for reference include:

- Sustainable Packaging Policy PDF
- Sustainable Packaging Guidelines Comsol Actions PDF
- Power BI Dashboards (Current and Original Type ID Direct Comparison; Current and Original Type ID Unit Material Use and Forecast; Total Unit Material Use; Unit Sales Forecast; Unit Sales Impact Report 2023; Unit Sales and Weights for Product and Combined Packaging; Unit Sales Full Overview; Unit Sales Tertiary [Transport] Material Use; note that more dashboard capabilities exist outside of these documents to manage material use and supply chain flow)
- 2023 Officeworks Portfolio Packaging Impact Report; 2023 Klik B2B Portfolio Packaging Impact Report; 2023 Retail & B2B Portfolios Packaging Impact Report
- Best Standard Packaging Material Requests
- Packaging Material Certification Documents
- Supplier Material Confirmation List Excel
- Email correspondence between suppliers and the Sustainability Department and Product and Design departments
- See reference as Sustainable Packaging Policy 2018.

#### Criteria 5 - Supporting Evidence

All of our SKUs include the ARL on pack. In addition we have created a Sustainably Connected branding, illustrated on our website for reference, that contains additional packaging labelling to encourage correct use at the end-of-life based on providing information to consumers. Examples include our made with recycled cardboard, zero plastic and plant-based ink information,

We also promote similar actions off-pack as well, within our Closing The E-Loop education program, refer to our website for more information, and through other communication channels too.

Additional on pack labelling includes:

- the mobius recycling loop,
- the regulatory compliance mark (marking of electrical products to indicate compliance with regulations as per Electrical Equipment Safety System and in relation to Australian Communications and Media Authority labelling requirements.
- the Restriction of Hazardous Substances Directive that limits hazardous material use that could effect the



product, packaging and consumer.

-the Waste Electrical and Electronic Equipment Directive.

In addition we incorporated the use of:

-a recycling message that encourages recycling the cardboard box alongside a smiling face thumbs up emoji.

All of these logos are spaced and compliant with the guidelines of the ARL logos, which has been assessed as part of the SKU evaluation process as part of PREP.

#### Criteria 6 - Supporting Evidence

Throughout the reporting period Comsol collaborated with a resource recovery organisation for on site waste collection via skip bins, a soft plastic bale and a cardboard compactor.

For reuse, our warehouse team utilise a process that reuses packaging boxes for outbound orders and other capacities.

In addition, within the offices, the team use segregated bins for recycling and waste that includes instructional signs on material disposal.

In house documents for reference include:

-cardboard compactor

-soft plastic bale

-specific bins for waste and recycling in the office with signs

-cardboard crusher Word, PDF and Image documents (this includes information on the soft plastic bale).

-Material Types an Explainer Series: Cardboard, Paper and Inks PDF

-Material Types an Explainer Series: Polymers

-Emails from the sustainability department about sustainable pallet wrap options and numerous resources in the Resources folder.

Please note due to the plastic supply chain situation related to RedCycle at the end of 2022 the use of the plastic bale was paused. The machine is still located on site and will restart use when a new operation commences to collect plastic wrap.

#### Criteria 7 - Please specify

Comsol have created an electronic waste education program, Closing The E-Loop, in collaboration with Cleanaway's kNOw Waste education team.

This resource targets students in Stage 4 (years 7-8) and is aligned to the following NESA Geography syllabus outcome.

Geography (GE4-3): explains how interactions and connections between people, places and environments result in change.

Students will:

- investigate the effects of the production and consumption of goods on people, places and environments throughout the world.

Closing The E-Loop provides three core learning intentions:

1. identify the global e-waste crisis;
2. understand the social and environmental impacts of e-waste; and
3. investigate solutions to the e-waste crisis.

This program speaks specifically of reducing waste for both products and packaging, with specific note of the ARL and being conscious consumers.

## Criteria 7 - Supporting Evidence

Similar to the earlier points on the other Criteria sections our packaging has phased out single-use plastic, particularly notable for blister pack type of lines and for sealer stickers (these products are now in recyclable cardboard boxes and all lines use paper stickers where there is a need to seal the units). The use of cardboard enables both reuse and recycling of retail, B2B and tertiary (transport) packaging. Specifically in regards to the pallet wraps for the warehouse the team use a thin pallet wrap film that has been implemented as an alternative to a thicker material in the past. We have investigated the use of material made from other sources but until our national retail partner implements a process that allows for the reuse of bio-based wrapping film as an example we are using the best standard we can at this time that also allows workplace safety (transport units on high warehouse shelves need to be wrapped) to be to the required level.

Our team have also undertaken ongoing educational campaigns where necessary that have highlighted the need to be aware of selecting packaging that uses material that is less harmful to the environment, highlighted most recently in our educational program Closing The E-Loop. Refer to our website for further details. Other specific examples run in house include promoting the use of segregated bins, cleaning of warehouse areas and education on previous transitions such as the use of coffee beans to replace coffee pods - all of these areas develop a good culture with people who are aware of social and environmental impacts about why the business is undertaking actions such as phasing out problematic and unnecessary single use plastic packaging and preventing/reducing litter.

In house documents for reference include:

- Sustainable Packaging Policy PDF
- Sustainable Packaging Guidelines Comsol Actions PDF
- Power BI Dashboards (Current and Original Type ID Direct Comparison; Current and Original Type ID Unit Material Use and Forecast; Total Unit Material Use; Unit Sales Forecast; Unit Sales Impact Report 2023; Unit Sales and Weights for Product and Combined Packaging; Unit Sales Full Overview; Unit Sales Tertiary [Transport] Material Use; note that more dashboard capabilities exist outside of these documents to manage material use and supply chain flow)
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- Material Types an Explainer Series: Cardboard, Paper and Inks PDF
- Material Types an Explainer Series: Polymers
- Emails from the sustainability department about sustainable pallet wrap options and numerous resources in the Resources folder