

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 2024 APCO Annual Report. With your chosen reporting period of January, 2023 - December, 2023 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.

Contact

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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's sustainability department plays a crucial role in ensuring compliance with APCO standards and Sustainable Packaging Guidelines (SPGs). Through close collaboration with design and manufacturing teams, Comsol ensures that its retail packaging meets the 'preferred' category in APCO's Fibre Based Packaging framework, achieving recyclability in all controllable areas. This adherence to SPGs criteria is verified through the Packaging Recycling Evaluation Portal.

Additionally, within the PoD portfolio, Comsol has adopted third-party certified recycled plastic materials.

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.

The implementation of the ARL on all retail packaging in combination with the use of the SPGs has enabled packaging that prioritises recyclable materials like cardboard and plant-based ink, promoting easy kerbside recyclability. Implementation of the Australasian Recycling Label (ARL) and adherence to PREP standards assure consumers of recyclability across the full retail portfolio.

*Continuous monitoring and assessment ensures compliance and improvement as demonstrated by the
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

- Material data stored and accessed as a dashboard on Power BI, in combination with details from Netsuite and Excel
- ARL Prep documentation
- Packaging design blueprints and documentation
- Packaging Material Certification Documents

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 upheld a dedicated sustainable packaging policy, marking a heightened commitment to environmental stewardship. This focus was further enhanced with the establishment of a dedicated sustainability department within the business in 2021. This department serves as a strategic hub, overseeing the integration of sustainable practices across all facets of packaging design, procurement, and distribution. By embedding sustainability into the core of our operations, we ensure that decisions regarding

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

Our packaging is compliant with APCO guidelines, as evidenced by our PREP tool rating and APCO reporting evaluations, with a specific focus on the fibre-based packaging framework. In the Calendar Year reporting period minor adjustments have been made to packaging, including the reduction of size and removal of separable parts compared to the previous reporting period. All SKUs meet standards for all controllable attributes.

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

Comsol has successfully integrated the Australasian Recycling Label (ARL) into all retail packaging, marking the third reporting cycle of this implementation, verified through assessment with the PREP tool. Additionally, B2B packaging is certified via the Global Recycled Standard, ensuring the use of recycled mono-material polymer and appropriately labelled to denote this standard.

Additionally, during this reporting period, Comsol launched an online educational platform, Clarify The F

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

Our team has implemented various on-site waste management processes to minimise landfill waste. Warehouse staff are encouraged to reuse tertiary packaging whenever possible, and we utilise a segregated cardboard compactor to manage cardboard waste effectively at our partner resource recovery

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

During the reporting period Comsol created a first-of-its-kind educational resource, Closing The E-Loop. The content equips individuals with knowledge and fosters collaboration to combat the global e-waste crisis. This initiative is designed to empower individuals to take decisive action against the mounting threat of electronic waste through knowledge and collaboration.

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

- None of the above

Supporting Evidence

- You can read more about this initiative on our website (<https://www.comsol.com.au/closingtheloop>).
- We developed the course with online education NFP Cool.Org, on their website is content directed to students in years 9/10 (<https://cool.org/closing-e-loop-teaching-circular-economy-secondary>).
- The collaboration noted above is highlighted best in our Sustainable Electronics Solutions video showcase,

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.

With our current packaging designs standardised in previous reporting years the most significant area of note is in the educational content created, Closing The E-Loop. The content equips individuals with knowledge and fosters collaboration to combat the global e-waste crisis. This initiative is designed to empower individuals to take decisive action against the mounting threat of electronic waste through

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

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 of note.

Full Open Responses

Criteria 1 - Supporting Evidence

Comsol's sustainability department plays a crucial role in ensuring compliance with APCO standards and Sustainable Packaging Guidelines (SPGs). Through close collaboration with design and manufacturing teams, Comsol ensures that its retail packaging meets the 'preferred' category in APCO's Fibre Based Packaging framework, achieving recyclability in all controllable areas. This adherence to SPGs criteria is verified through the Packaging Recycling Evaluation Portal.

Additionally, within the B2B portfolio, Comsol has adopted third-party certified recycled plastic polybags. This mono-material solution not only promotes the growth of secondary raw material markets but also strikes a balance between environmental sustainability and operational efficiency.

With the successful implementation of the polybag solution, Comsol's next phase of packaging innovation is marked by the planned use of FSC Certified packaging in the retail portfolio. This certification process began in calendar year 2023 and is scheduled for full implementation in 2024.

- Sustainable Packaging Policy PDF 2018
- Sustainable Packaging Guidelines Comsol Actions PDF and Excel checklist 2021-Current
- Power BI Dashboards
- Packaging Impact Reports 2021-Current
- Packaging Material Certification Documents
- FSC Certification and Supplier Statements
- Global Recycled Standard (GRS) credential polybag portfolio
- Environmental and Operational compliance documentation for GRS products
- Public submissions to government conversations on electronic product management throughout the supply chain
- System and strategy mapping documentation
- Sustainability Progress Report
- Educational content including Closing The E-Loop

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

The implementation of the ARL on all retail packaging in combination with the use of the SPGs has enabled packaging that prioritises recyclable materials like cardboard and plant-based ink, promoting easy kerbside recyclability. Implementation of the Australasian Recycling Label (ARL) and adherence to PREP standards assure consumers of recyclability across the full retail portfolio.

Continuous monitoring and assessment ensures compliance and improvement, as demonstrated by the team's swift response to a supply chain complication involving the use of BOPP film in packaging. Despite minimal use that remained within APCO's Fibre Based Packaging guidelines, Comsol swiftly collaborated with APCO and other stakeholders to remove this unnecessary addition. Moving forward, our sustainably focused objectives will be bolstered through the implementation of FSC packaging, an important third-party assessment process, and ongoing evaluation of printer suppliers and materials used.

Criteria 2 - Supporting Evidence

- Material data stored and accessed as a dashboard on Power BI, in combination with details from Netsuite and Excel
- ARL Prep documentation
- Packaging design blueprints and documentation
- Packaging Material Certification Documents
- FSC certifications
- Packaging Impact Reports 2021-Current
- Sustainable Packaging Intricacies and Challenges of Supply Chains document
- Sustainable Packaging Guidelines Comsol Actions PDF and Excel checklist 2021-Current
- Sustainable Packaging Policy 2018
- Email correspondence between APCO and other supply chain stakeholders in the resolution of BOPP supply chain complication

Criteria 3 - Supporting Evidence

Since 2018, Comsol has upheld a dedicated sustainable packaging policy, marking a heightened commitment to environmental stewardship. This focus was further enhanced with the establishment of a dedicated sustainability department within the business in 2021. This department serves as a strategic hub, overseeing the integration of sustainable practices across all facets of packaging design, procurement, and distribution. By embedding sustainability into the core of our operations, we ensure that decisions regarding the use of recycled and sustainable materials are governed by clear policies and guided by strategic objectives aimed at minimising environmental impact while maximising efficiency and effectiveness.

- Sustainable Packaging Policy PDF 2018
- Sustainable Packaging Guidelines Comsol Actions PDF and Excel checklist 2021-Current
- Power BI Dashboards and associated Excel documents recording the use of recycled content
- Packaging Material Certification Documents
- System and strategy mapping documentation
- Sustainability Progress Report
- Educational content on Closing The E-Loop, with specific note on APCO, the National Retail Association and Grounded Packaging content

Criteria 4 - Supporting Evidence

Our packaging is compliant with APCO guidelines, as evidenced by our PREP tool rating and APCO reporting evaluations, with a specific focus on the fibre-based packaging framework. In the Calendar Year reporting period minor adjustments have been made to packaging, including the reduction of size and

removal of separable parts compared to the previous reporting period. All SKUs meet standards for all controllable attributes.

Our next strategic aim, focused on providing quality material for recoverability, involves implementing FSC packaging, further enhancing our commitment to third-party certified materials, following the lead set by our Global Recycled Standard recycled polybag range.

Notably, our retail fibre-based packaging's simplicity and mono-material design facilitate easy recycling through yellow kerbside bins and Material Recovery Facilities. Similarly, the mono-material construction of our B2B polybag range positions it for potential recovery, contributing strategically to future soft plastic recycling initiatives across Australasia.

- Sustainable Packaging Policy PDF 2018
- Sustainable Packaging Guidelines Comsol Actions PDF and Excel checklist 2021-Current
- Power BI Dashboards and associated Excel documents recording the use of material content
- Packaging Material Certification Documents
- System and strategy mapping documentation
- Email correspondences and material documentation between upstream suppliers and Comsol product and sustainability teams
- PREP Tool evaluation and APCO reports

Criteria 5 - Supporting Evidence

Comsol has successfully integrated the Australasian Recycling Label (ARL) into all retail packaging, marking the third reporting cycle of this implementation, verified through assessment with the PREP tool.

Additionally, B2B packaging is certified via the Global Recycled Standard, ensuring the use of recycled mono-material polymer and appropriately labelled to denote this standard.

Additionally, during this reporting period, Comsol launched an online educational platform, Closing The E-Loop, which includes dedicated content on labelling and packaging. This resource features engaging video interviews with key industry stakeholders such as APCO, the National Retail Association, and Grounded Packaging, alongside teacher lesson plans designed to enhance understanding and awareness of product labelling practices. Content is available via Comsol's website, partner Cool.Org's website and on Planet Ark's National Recycling Week lesson plan webpage.

- PREP tool, evaluation and APCO reporting documentation
- Power BI dashboard and associated Excel documents recording the use of material content
- Sustainable Packaging Guidelines Comsol Actions PDF and Excel checklist 2021-Current
- GRS documentation for packaging and products
- Packaging designs and printed artwork inclusive of the ARL logos and GRS certification on retail and B2B packaging respectively

Criteria 6 - Supporting Evidence

Our team has implemented various on-site waste management processes to minimise landfill waste.

Warehouse staff are encouraged to reuse tertiary packaging whenever possible, and we utilise a segregated cardboard compactor to manage cardboard waste effectively at our partner resource recovery centre, JJ Richards.

Regarding soft plastics, following the national collapse of RedCycle, our team transitioned to a partnership with RecycleSmart for managing and processing pallet wraps. This approach ensures the collection and processing of soft plastics for further use downstream.

For electronic waste, we collaborate with Ecocycle, an electronic recycling and recovery company. This partnership facilitates the collection and processing of e-waste on-site, ensuring it is handled responsibly and in line with standardised resource streams.

For pallets our team utilise CHEP pallets within Australian distribution operations and work with recovery partners for plastic, HDPE, pallets sent during international shipments.

In our office management practices, we segregate waste bins into different streams to minimise landfill waste. This includes separate bins for soft plastics, cans, and general recycling, providing employees with appropriate disposal options.

- Cardboard compactor and documents from JJ Richards
- Soft plastic bale and documentation from JJ Richards and RecycleSmart
- Electronic waste bin and documentation from Ecocycle
- Documentation from Abbey pallets for the collection of HDPE pallets
- Specific bins for waste and recycling in the office

Criteria 7 - Please specify

During the reporting period Comsol created a first-of-its-kind educational resource, Closing The E-Loop. The content equips individuals with knowledge and fosters collaboration to combat the global e-waste crisis. This initiative is designed to empower individuals to take decisive action against the mounting threat of electronic waste through knowledge and collaboration.

At its core, Closing The E-Loop represents a holistic approach to e-waste management (both product and packaging) promoting multi-stakeholder participation across the supply chain, fostering understanding, and encouraging action at all levels of society. Through engaging and informative resources, individuals gain insight into the lifecycle of electronic products and the circular economy, demystifying complex concepts and making sustainability accessible to all.

Criteria 7 - Supporting Evidence

- You can read more about this initiative on our website (<https://www.comsol.com.au/closingtheloop>).
- We developed the course with online education NFP Cool.Org, on their website is content directed to students in years 9/10 (<https://cool.org/closing-e-loop-teaching-circular-economy-secondary>).
- The collaboration noted above is highlighted best in our Sustainable Electronics Solutions video showcase, an engaging interview portfolio made with 38 stakeholders in the industry from across the supply chain. This content is relevant for high schoolers, university students and adults alike, empowering change at work, home and school (<https://vimeo.com/showcase/sustainable-solutions-for-e-waste>).
- The content is also available via Planet Ark's Recycling Near You Lesson Plan webpage (<https://recyclingnearyou.com.au/nationalrecyclingweek/at-school/lesson-plans>)
- Sustainable Packaging Policy PDF 2018
- Sustainable Packaging Guidelines Comsol Actions PDF and Excel checklist 2021-Current
- ARL Prep documentation
- Packaging design blueprints and documentation
- Packaging Material Certification Documents
- Email correspondences and material documentation between upstream suppliers and Comsol product and sustainability teams
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supply chain complication

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

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Specifically content with APCO, National Retail Association and Grounded Packaging provide in depth resources for packaging sustainability initiatives.

APCO content synopsis:

-Learn about the complexities of recycling, the importance of sustainable packaging, the need for accurate labelling and how businesses are increasingly engaging across the supply chain. Explore APCO's pivotal role in the transition towards a circular economy for packaging. Learn how APCO collaborates with diverse stakeholders to establish a sustainable packaging ecosystem. Find out about the Sustainable Packaging Guidelines and gain insights into the requirements that ensure credibility with the Australasian Recycling Label (ARL). Learn how the ARL combats greenwashing and empowers individuals to make informed recycling choices.

National Retail Association (NRA) synopsis:

-Access valuable knowledge, facilitating a deeper understanding of packaging and witness the optimism the NRA holds for a sustainable future driven by conscious consumers and industry initiatives. Learn about the NRA's efforts to enhance sustainability. Discover how the NRA, representing a vast array of retail outlets, prioritises waste reduction and sustainability, shaping a more eco-conscious retail industry. Find out how consumers can make informed choices by understanding the nuances of eco-friendly products and sustainable packaging. Understand how sustainability labelling can empower people's choices for a sustainable future.

Grounded Packaging content synopsis

-Understand the variety and impacts of the materials used for packaging and find out how consumers can actively use purchase power to support brands leading a transition away from single-use plastics. Explore Grounded Packaging's specialised approach to developing sustainable packaging. Learn how globally certified materials and cutting-edge manufacturing techniques can combat the pervasive issue of single-use plastics. Find out about plastic packaging, its origins, and the benefits of opting for recycled or bioplastic alternatives. Learn about the crucial role of sourcing secondary materials for packaging to reduce virgin fossil fuel use.