



**AUSTRALIAN PACKAGING
COVENANT**

ACTION PLAN

2011 - 2013



Executive Summary

Roche Products Pty Limited is the Australian pharmaceutical division of the Roche Group, a multinational pharmaceutical and diagnostics company headquartered in Basel, Switzerland. Local operations are headquartered in Dee Why, NSW and supports administration and operational activities.

Globally Roche maintains a strong commitment to sustainability and invests significantly in environmental programs and improvements. Roche Products implements this commitment to minimise the environmental impact of business operations and has made significant improvements in energy and water efficiency and implemented a range of sustainability programs.

As a signatory to the Australian Packaging Covenant, we will implement further actions to reduce the impact of our packaging, institute a more sustainable purchasing program and minimise waste to landfill where possible.

While Roche Products has limited influence on the design of imported primary and secondary packaging, our review process will seek to improve and influence packaging design where there are opportunities.

A handwritten signature in black ink, appearing to read "Fred Nadjaran".

Fred Nadjaran
Managing Director
Roche Products Pty Limited
March 2011 (Revised March 2012)



About Roche Products

Roche Products Pty Limited is the Australian pharmaceutical division of the Roche Group, a multinational pharmaceutical and diagnostics company headquartered in Basel, Switzerland. Local operations are headquartered in Dee Why, NSW and supports administration and operational activities. The Dee Why site encompasses sales and marketing, medical, finance, information technology, logistics and human resources functions. In addition, there are four small office and warehouse facilities located in Brisbane, Melbourne, Adelaide and Perth.

Roche Products imports and distributes pharmaceutical products, which are primarily prescription medicines, to hospitals, chemists and other medical clinics both directly and via the wholesale network. In 2010, the approximate turnover of Roche Australia was \$522 million dollars. A product list is outlined below.

Products

MIRCERA (methoxy polyethylene glycol-epoetin beta)

NeoRecormon (epoetin beta)

Cymevene (ganciclovir)

Fuzeon (enfuvirtide)

Invirase (saquinavir)

Pegasys (peginterferon alpha 2a)

Pegasys RBV (peginterferon alfa 2a ribavirin)

Roferon-A (interferon alfa-2 a)

Tamiflu (oseltamivir)

Valcyte (valganciclovir)

Bactrim (sulfamethoxazole trimethoprim)

Rocephin (ceftriaxone)

Anaprox (naproxen)

Naprosyn (naproxen)

Naprosyn SR (naproxen)

Proxen SR (naproxen)

Toradol (ketorolac trometamol)

Dilatrend (carvedilol)

Kredex (carvedilol)

Hypnovel (midazolam)

Lexotan (bromazepam)

Madopar (levodopa benserazide)

Rivotril (clonazepam)

Valium (diazepam)



Anexate (flumazenil)

Konakion MM (phytomenadione)

Konakion MM Paediatric
(phytomenadione)

Lariam (mefloquine)

Pulmozyme (dornase alfa)

Rocaltrol (calcitriol)

Xenical (orlistat)

Avastin (bevacizumab)

Herceptin (trastuzumab)

MabThera (rituximab)

Tarceva (erlotinib)

Xeloda (capecitabine)

Roaccutane (isotretinoin)

Vesanoid (tretinoin)

Actemra (tocilizumab)

CellCept (mycophenolate mofetil)



Product Packaging

The primary function of Roche product packaging is to ensure Roche pharmaceutical products can be safely used by patients and customers.

All primary, secondary and tertiary packaging is first and foremost designed to meet local and international regulatory requirements. Depending upon the pharmaceutical product, this may include packaging that maximises shelf-life, maintains the cold chain during transportation and storage and minimises the risk of product damage and tampering. In addition, packaging must be practical and cost-effective.

In order for the packaging to achieve its primary function, a range of different packaging materials are used including glass, plastics, aluminium, rubber, foil, cooling elements, paper and cardboard. Where possible, as much recycled content is used in the packaging however this varies across the product due to factors such as technical feasibility and quality issues.

All Roche primary and secondary packaging, and much of the tertiary packaging, is designed and manufactured overseas and imported to Australia. The Australian operation has limited influence on the design of this packaging.

Corporate Standards and Environmental Performance

Excerpts from *Policy on Safety, Health and Environmental Protection in the Roche Group 2005* and the *Guidelines for the Assurance of Safety and Environmental Protection 2007*.

Mission

Our aim as a leading healthcare company is to create, produce and market innovative solutions of high quality for unmet medical needs. Our products and services help to prevent, diagnose and treat diseases, thus enhancing people's health and quality of life. We do this in a responsible and ethical manner and with a commitment to sustainable development respecting the needs of the individual, the society and the environment.

Commitment to the Environment

As part of our commitment towards sustainable development we proactively seek to employ new, more sustainable technologies and processes and to minimize our impact on the environment.



General Principles

Matters of safety, health and environmental protection are integral parts of business planning, processes and decision making and are handled with the same sense of responsibility, and just as methodically, as quality, productivity and cost-efficiency. This covers all issues within Roche as well as outside. Production constraints and other purely economic considerations must not be allowed to have an undue impact on people and the environment.

Priorities

At Roche, prevention is the key element for all activities, decisions and measures aimed at ensuring safety, health and environmental protection. In this context Roche is also engaged in local and international research projects aiming at a better understanding of the impacts of our business activities.

The principles of risk analysis and risk management (i.e. identification, evaluation, assessment, prevention and reduction of risks) apply to all areas of safety, health and environmental protection.

If a safety, health or environmental risk is deemed unacceptable even after implementation of all technical, organizational and personnel measures, the materials or processes concerned must be replaced, withdrawn or discontinued.

Integrated process optimization regarding environmental impacts takes precedence over the end-of-pipe treatment of by-products, waste or pollutants. Similarly, the inherent safety of plants and processes has priority over other safety measures.

Packaging Materials

- Minimize the quantity of packaging materials used for all types of products and operations, without compromising safety and quality.
- Choose those packaging materials with favorable properties (eco-balance, safety, potential for re-use and recycling).
- Re-use and recycle packaging materials where possible.

Waste Management

In the field of waste management and waste disposal, the following principles and procedures in particular are important:

- Exhausting all possibilities to avoid and reduce waste in the context of eco-efficiency;
- Treatment of residual waste according to the following priorities:
 1. recycling to the original starting material, as far as technically, ecologically (in terms of energy expenditure) and economically feasible;



2. downcycling to a lower-value product (eg. Paper to cardboard);
 3. valorization, ie. Processing to a saleable product;
 4. thermal valorization, ie. Incineration with heat recovery (for waste with a high energy content, eg. Distillation residues, inseparable solvent mixtures, etc.);
 5. incineration without heat recovery, ie. Conversion to a mineralised end product;
 6. landfill (whenever possible restricted to mineralised material suitable for final disposal);
- Collection of general waste at source for recycling or reuse;
 - Avoidance of chemical and general waste being mixed;
 - Supervising proper disposal on site as well as by contractors;
 - Determination of relevant data by the local Safety and Environment organisation according to local legal requirements and in-house provisions; safekeeping of all relevant documents for an unlimited period;

Environmental Performance

Roche collects safety, environmental and social information from all facilities on an annual basis. This information is compiled into a global Annual Business Report which outlines performance in a number of areas. The link to the latest Roche Annual Report is:

http://www.roche.com/investors/annual_reports.htm

Roche Products Pty Limited, Australia

Roche Products Pty Limited in Australia has had a proactive environmental program in place for many years. This program includes site and travel energy efficiency programs and the minimization of water use where possible. We have achieved significant savings in these areas over the last two to three years.

In regards to product packaging, recycled materials or compostable materials are used where opportunities have been identified. This currently includes cardboard boxes with recycled content and compostable void fill products.

We have a well-established and long standing on-site recycling program for most materials. The following list outlines the materials and equipment currently being recycled:

- Cardboard
- Glass, aluminium and plastic beverage containers
- Paper



- Fluorescent lighting tubes
- Computers
- Mobile phones – Donated or recycled
- Printer and photocopier cartridges
- Wooden and plastic pallets, where possible
- Batteries
- Oil
- Metal
- Polystyrene
- Freezer bricks.

Regular waste reviews are conducted to ensure additional opportunities to recycle waste are identified and implemented.

Please see the Roche Products Pty Limited Environment Management Policy on the following page.

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Environment Management Policy Roche Products Pty. Limited, Australia

Roche Products Pty. Limited, Australia is dedicated to running our operation in a way that minimises the impact on resources, land, water, air, flora and fauna.

Roche strives to be the leader in environmental performance in the pharmaceutical industry. Roche will:

- Allocate appropriate resources to ensure that minimal environmental impact is achieved;
- Optimise plant and processes in order to minimise usage of energy, water and other resources;
- Minimise generation of waste, and minimise the proportion of waste requiring disposal, through actively encouraging the reuse and recycling of waste materials including cardboard and paper, old furniture, metals and glass;
- Meet or exceed Company, legislative and good practice requirements;
- Actively promote values, attitudes and behaviours that will continue to reduce our environmental impact;
- Induct, educate, train, evaluate and supervise employees and subcontractors to ensure that work is conducted in an environmentally friendly manner;
- Document and regularly review processes and procedures for their environmental impact;
- Investigate environmental incidents, and ensure that corrective actions are implemented to prevent recurrence;
- Collect positive performance indicators and incident data, and utilise this information to drive continuous environmental improvement processes;
- Make managers and supervisors responsible and accountable for the impact of their plant and processes on the environment;
- Communicate to employees that they have an obligation to protect the environment, for the benefit of the wider community.

Fred Nadjarian
Managing Director
Roche Products Pty. Limited, Australia
8 October 2002



Schedule for Packaging Review

Domestic Packaging – Tertiary

Domestic tertiary packaging includes boxes, containers, void fill materials, insulation materials and cooling elements. This packaging is purchased in Australia and is used to transport Roche products to wholesalers and other customers.

The review of domestic packaging will be conducted by total tertiary packaging solution. Each review will cover the external container and all fill materials.

Packaging Type	Review Date
Coolpac	September 2011
Ambient product packaging	February 2012

Imported Packaging – Primary

Imported primary and secondary packaging include the materials in which individual products are supplied. The design and purchase of this packaging is conducted in Roche global headquarters. The Australian affiliate has minimal influence over the design and purchase of imported packaging materials.

The review of imported packaging will be done by packaging material type, rather than by product due to the high number of products and similarities in design and materials across products.

Packaging Type	Review Date
Get Cool 1	April 2012
Glass ampoules and bottles	June 2012
Syringes	August 2012
Droppers	October 2012
Plastic bottles	December 2012
Blister packaging	March 2013

Imported Packaging - Secondary

Packaging Type	Review Date
Cardboard boxes	May 2013
Cardboard shippers	July 2013
Large grey eskies, including ice bricks and fill	September 2013



**Roche Australia
Australian Packaging Covenant
Action Plan 2011 – 2013**

Covenant Goal	Action	Responsibility	Baseline Data	Target	Timeline
1. Design – optimise packaging to achieve resource efficiency and reduce environmental impact without compromising product quality and safety	Develop template and process for reviewing packaging against Sustainable Packaging Guidelines	Safety and Environment Manager	No process in place	Procedure and documents developed	May 2011
1. Design – optimise packaging to achieve resource efficiency and reduce environmental impact without compromising product quality and safety	Review all new and existing, local and imported packaging against the Sustainable Packaging Guidelines	Safety and Environment Manager Head Outbound Logistics Packaging supplier (domestic packaging) Corporate packaging personnel (imported packaging)	No packaging has yet been reviewed against the Sustainable Packaging Guidelines	All new and existing packaging to be reviewed	December 2013
1. Design – optimise packaging to achieve resource efficiency and reduce environmental impact without compromising product quality and safety	Review key Roche suppliers against Safety and Environment guidelines to determine minimum standards are achieved.	Safety and Environment Manager Roche contact Supplier representative	Guidelines have been developed. Two suppliers have been audited against guidelines	Identify and audit all key suppliers	December 2012



2. Recycling – the efficient collection and recycling of packaging	Review current on site recycling programs to ensure all potential recycling opportunities have been identified and implemented	Safety and Environment Manager Facilities Manager	Comprehensive recycling program in place	Documented review of on-site recycling	June 2012
2. Recycling – the efficient collection and recycling of packaging	Develop and implement sustainable purchasing program including a Buy Recycled policy	Safety and Environment Manager	No sustainable purchasing program in place	Sustainable purchasing program developed and implemented	December 2011
3. Product Stewardship – a demonstrated commitment to product stewardship by the supply chain and other signatories	Complete process commenced with NPC to ensure all secondary packaging is labelled as recyclable	Safety and Environment Manager Regulatory Affairs Department	86 of 105 products are labelled as recyclable	Buy Recycled Policy 105 products labelled as recyclable	June 2012 December 2012
3. Product Stewardship – a demonstrated commitment to product stewardship by the supply chain and other signatories	Complete implementation of reverse logistics program for identified cold chain packaging	Head Outbound Logistics	Pilot program has been successful	Implementation of reverse logistics program	December 2011
3. Product Stewardship – a demonstrated commitment to product stewardship by the supply chain and other signatories	Ensure suppliers of local packaging are involve with SPG reviews	Safety and Environment Manager Head Outbound Logistics	No process yet in place	Suppliers of local packaging engaged in all SPG reviews of local packaging	December 2013