

# GUIDELINES FOR ALUMATE PRODUCT STEWARDSHIP SCHEME

# 7th June 2024

#### **Status of this document**

These Guidelines were developed by ALUMATE

These Guidelines will be implemented by ALUMATE and its Distributors throughout Australia.

#### Acknowledgements

ALUMATE ARCHITECTURAL PRODUCT is committed to responsible end-of-life product management and the core principles of product stewardship and extended supplier responsibility.

As supplier of ALUMATE ARCHITECTURAL PRODUCTS, ALUMATE understands that corporate social and environmental responsibility goes beyond the point of sale and warranty periods.

As we, ALUMATE, established our stewardship program for end-of-life product management. Our product stewardship options include:

- The pick up or drop off of ALUMATE Architectural Products from customers for the recycling of end-of-life products.
- De-installation or removal of ALUMATE Architectural Products for recycling purposes.
- Disassembly of ALUMATE Architectural Products for component and/or materials reuse in new product manufacturing.
- Replacement of ALUMATE End-of-life Products for refurbishment.

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#### About this document

This document was approved by ALUMATE, and it provides comprehensive information about the scheme and sets out the commitments that participants are required to meet. This document also provides advice to clarify the scheme's requirements and enable businesses and organisations to make informed decisions on whether to apply. This document also helps businesses and organisations to identify any preparations they need to make before they apply.

This document takes the form of a manual, designed to direct businesses and organisations to the parts most relevant to them:

Parts A and B apply to all Participants in the scheme.

<u>Part A</u> outlines the operation of the ALUMATE Product Stewardship Scheme and how the scheme works, as well as its objectives, principles and scope. It also includes the general commitments that apply to all Participants in the scheme and describes how the scheme is administered, and performance is measured.

<u>Part B</u> sets out the requirements that apply to the use of the schemes. All Parties in the scheme need to comply with these requirements.



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# PART A - THE SCHEME AND GENERAL COMMITMENTS

#### **PLEASE NOTE:**

Participation in the ALUMATE Stewardship Scheme is voluntary.

A business or organisation that joins the scheme is required to comply with commitments that apply to them.

The commitments are set out in these Guidelines:

- Parts A and B set out the general commitments.

All Participants are required to comply with the general commitments in Parts A and B.

- **Parts C to E** set out the action plan and specific commitments that apply to different types of Participants.

Participants are required to comply with at least one of the parts in Parts C to E.



#### 1. The scheme

#### 1.1 Introduction

At ALUMATE, we are committed to sustainability and environmental responsibility. As part of our dedication to reducing our ecological footprint, we have formulated the 'End of Product Life Cycle Policy for recycling ALUMATE aluminium products." This policy outlines our approach to managing aluminium products at the end of their lifecycle, ensuring their responsible disposal and recycling to contribute to a circular economy and minimize waste generation.

#### 1.2 About the scheme

The scheme is designed to increase resource recovery and recycling and to minimise the environmental, health and safety impacts of all end-of-life product generated in Australia.

This will be achieved through the establishment of:

- the product stewardship and ALUMATE will be responsible for administering the scheme and managing end of life product disposal to the collector.
- a series of commitments requiring participants in the scheme to play their part in ensuring end-of-life products are disposed in a transparent and accountable manner.
- performance measures and targets.

#### 1.3 Benefits

The scheme is designed to deliver a range of benefits for individual Participants, the industry as a whole and for the community. These include:

- increased use of a resource stream currently being disposed of as waste.
- increased capacity to handle end-of-life product in Australia.
- an improved business environment particularly for collectors and recyclers.
- increased consumer awareness of the impacts of end-of-life disposal.



# 2. Objectives, principles and scope

# 2.1 Objectives

The objectives of the scheme are to:

- increase resource recovery and recycling and minimise the environmental, health and safety impacts of end-of-life product generated in Australia.

# 2.2 Principles

The Product Stewardship:

- is ALUMATE operated and can be accessed on ALUMATE website
- offers pick up and drop off for the ALUMATE end-of-life products depending on the job site:
  - Pick up: A truck or a waste metal collector will be arranged by ALUMATE to collect the end-of-life product from the customer.
  - Drop off: A drop off point will be arranged, and the customer needs to drop the end-of-life product to the arranged location.
- the end-of-life products will then be relocated to aluminium recycling centres
- acknowledges the inherent value of all end-of-life product across Australia
- recognises that there is a cost associated with ensuring the environmentally sound use of end-of-life product
- is committed to achieving the highest value end use possible for end-of-life in accordance with the waste management hierarchy.
- complements relevant policies and legislation and supports compliance with relevant laws and practices, including those that apply to the environment and occupational health and safety, and
- is appropriately resourced and empowered to deliver its objectives according to agreed timeframes.

#### End-of-life collection and recycling services to be provided

- Coordinate de-installation
- Coordinate collection and removal from site
- Coordinate full product replacement
- Coordinate product disassembly for components
- Coordinate product disassembly for materials recycling and processing

#### **Notes:**

- 1. The customer shall bear the full costs of any activity associated with de-installation, replacement, collection, and removal of products.
- 2. Standard labour rates of the day will be applied to any activity specified above.
- 3. The customer will be responsible for the safe removal of all power and communication cables/wiring prior to ALUMATE product de-installation.
- 4. Subject to agreement in writing by all parties, cost attribution other than that noted above can be negotiated between ALUMATE and the customer.



## 2.3 Waste hierarchy

The scheme is consistent with the 'waste hierarchy' of strategies for dealing with waste. The waste hierarchy is referenced in many Australian jurisdictions' legislative and policy instruments that protect the environment and conserve resources.

For instance, the recycling of wasted aluminium is consistent with the objectives of the scheme as it extends the life of the product and delays the material's entry into the waste stream. There are no requirements imposed by the scheme in relation to recycle the products. Recycling and energy recovery are included in the definition of environmentally sound use. Disposal through dumping, landfill, direct incineration or burning are excluded in the definition of environmentally sound use.



Source: National Waste Report 2010, Environment Protection and Heritage Council and the Department of Environment, Water, Heritage and the Arts, 2010, p.21

# 2.4 Scope

The scheme will be national in scope and is relevant to all ALUMATE products entering the Australian market for the first time.



# 3. General commitments for all participants

This section sets out the general commitments that apply to all Participants.

#### 3.1 General commitments

All Participants in the scheme commit to:

- support the objectives of the scheme.
- deal transparently and ethically with others involved in the product supply chain, including consumers.
- comply with relevant laws and practices, including those that apply to the environment and occupational health and safety; and
- co-operate with surveys that are undertaken from time to time, and with random or risk-based audits as instigated by ALUMATE. This includes retaining and, on request, providing to ALUMATE the documentation specified in the relevant guidance on documentation in these Guidelines.

All Participants in the scheme also commit to and contribute to:

- the environmentally sound use of end-of-life product.
- elimination of the illegal dumping of end-of-life product.
- elimination of disposal of end-of-life aluminium products to landfill.



# Enterprise to enterprise agreements and other forms of contractual arrangements

Participants in the scheme can be confident that they meet their commitments on an ongoing basis and maintain their accreditation if they formalise their relationships with other Participants through enterprise-to-enterprise agreements or other forms of contractual arrangements. Such agreements would be subject to relevant competition laws.

Such agreements and contracts have an important role in the implementation of the scheme. They can ensure that end-of-life products are handled, collected, transported, stored and reused or recycled in accordance with the objectives of the scheme. They also provide a means of addressing key barriers to the product stewardship of product by:

- incorporating requirements for recovering the full cost of disposal of an endof-life product by including it in the consumer price and ensuring that the money is paid to an accredited recycler
- requiring the appropriate disposal of end-of-life product to accredited recyclers, thereby helping to address the inappropriate disposal of and increasing the supply of end-of-life product to build domestic markets for ALUMATE derived products, and
- ensuring compliance with existing regulatory controls.



#### 4. Administration of the scheme

#### 4.1 Governance – ALUMATE

ALUMATE will administer the stewardship scheme. The principal objectives to be included in the constitution of the entity are to:

- implement the product stewardship scheme for end-of-life product.
- monitor, audit and report on the development of the scheme.
- undertake education, awareness and information activities to promote the scheme and the value of end-of-life utilisation.
- support market development and early-stage research in the field of end-of-life product utilisation for the benefit of industry.

# 4.2 Funding

ALUMATE is to be funded by a rate proportional to the number of products imported into Australia. Consistent with the principles of the scheme, it is acknowledged that this cost may be passed through the distributors/retail chain to the consumer as an expense associated with the operation of the scheme.

The level of contribution is to be agreed by the parties to the scheme contributing funds and is subject to review. Contributions will be based on a levy of 25 cents per kilogram or equivalent membership fee.

ALUMATE will design a mechanism in relation to crediting the levy contribution or equivalent membership fee for products that are exported and are not entering the Australian waste stream.

ALUMATE uses funds raised in this manner for:

- organisational management costs
- implementation of its strategy for handling end-of-life
- administration of the scheme, including costs associated with accreditation and audit of participants and reporting
- promotion of the scheme
- market development and research.

Funds raised to implement this scheme will be applied to measures set out above to benefit the whole industry in a manner that does not lead to unintended support for commercial operations of individual companies at the expense of others.



#### Promotion of the scheme

It will be important for the success of the scheme for consumers to be aware of, and support, its goals. Especially in its initial period, ALUMATE will promote the scheme to the building industry and the public to increase awareness of the impacts of end-of-life product disposal and encourage participation in the scheme.

# 4.3 Strategy for handling end-of-life product

ALUMATE also has a function in developing and implementing a strategy designed to facilitate the widest possible adoption of the scheme. ALUMATE will consult with stakeholders on the development of the strategy. As key elements of the strategy, ALUMATE:

- tailors its activities and investment strategies to ensure increased recycling and resource recovery on a local, regional and national basis, in recognition of the unique geographical and regional challenges in Australia.

### 4.4 Stewardship Research Fund

Research funding provided by ALUMATE is dedicated from early stages through to proof-of-concept research and development for the utilisation of end-of-life product. Funds will not be available to companies or institutions to support commercialisation activities, i.e., where funding through venture capital and or debt/equity funding would normally apply.

The objectives of the ALUMATE are to:

- advance innovative technologies in Australia by supporting focused, collaborative research in high priority technologies.
- retain local expertise in, and attract international expertise to, Australia in technologies related to end-of-life aluminium products.
- support the growth of skills and capacity in Australia in technologies related to endof-life aluminium products for the domestic and international markets; and
- share the results of that research with the wider industry as appropriate whilst respecting intellectual property rights.

# 4.5 Protection of confidentiality and privacy

In compliance with relevant legislation, ALUMATE has measures in place to:

- protect the privacy of Applicants and Participants in the scheme
- maintain the confidentiality of information obtained through the processes of verification and audit, and
- protect the privacy of parties involved with the processes involved with administering the Research Fund and to maintain the confidentiality of all information acquired through those processes.



#### 4.6 Process for amendment of Guidelines

This document may be amended from time to time.

For a major amendment, where there are potential impacts on Participants, a consultation process is to be undertaken on the proposed amendment and comments sought. The eventual amendment is to be announced on the scheme website.

For amendment, where there are no or minor potential impacts on Participants, an announcement of the amendment may be made on the scheme's website.



# 5. Processes and compliance

# 5.1 Application and approval process

The following steps apply to the process for applying for status as a Participant in the scheme and the process for approving the application/s:

- An Applicant submits one or more application forms online on the scheme's website or by email or mail. Application forms are provided in Parts C to E of this document.
- A business or organisation is expected to undertake investigations, enquiries and due diligence to satisfy itself of the implications of becoming a Participant in the scheme before submitting an application to ALUMATE.
- An application consists of: a completed application form signed by an Authorised Signatory, including an Action Plan. Action Plan templates are provided with each application form.

In signing the application form, the Authorised Signatory makes an organisational commitment to the scheme and to compliance with these Guidelines. Such commitment is a condition of approval of the application.

#### Guidance:

An Applicant can apply for Participant status in more than one category and, in some instances, is **required** to apply for Participant status in more than one category. (See Section 3.2.)

A full application package, as described above, should be submitted for each category applied for.

- ALUMATE assesses the application/s and may contact third parties to verify information supplied in the application form. (See Section 5.2.)
- ALUMATE assesses the Action Plan and may require amendments to the plan before giving approval.
- When satisfied with the application and the Action Plan, ALUMATE gives approval for the Applicant to be given status as a Participant.
- When the application is approved, ALUMATE advises the Applicant and issues:
  - a customised copy of the Participant Commitment signed by ALUMATE.
  - an electronic template for the new Participant's entry in the relevant list/s on the scheme's website
  - a template for notification of any change in the Participant's details, including any change to the arrangements to collect or recycle end-of-life product,



- an approval to use the ALUMATE logo, and
- a template for annual self-certification (these templates will be developed by ALUMATE).

A timeframe for the assessment of applications will be developed by ALUMATE prior to commencement of the scheme. This will need to be balanced with staffing resources in the event of a large number of applications; however, an indicative timeframe is 30 days from the time the application is received.

# 5.2 Compliance

#### 5.2.1 Verification of information in applications

Verification is carried out when ALUMATE assesses an application for Participant status and continues after Participant status is awarded.

As required, ALUMATE contacts businesses or organisations that are named in applications to verify the information provided in the application. Thereafter, on a regular basis, ALUMATE liaises with businesses or organisations named in the applications to ensure that the arrangements for collection and recycling of end-of-life aluminium products are still in place.

If verification checks prove arrangements are not in place, ALUMATE will contact the Participant to seek an explanation. If the explanation is not satisfactory, then Participant status and benefits may be revoked by ALUMATE.

Participants should inform ALUMATE of any changes to arrangements for collection and recycling of end-of-life aluminium products at the earliest opportunity. This is to ensure that information about Participants held by ALUMATE remains current.

#### 5.2.2 Audits

As one of their commitments, Participants are required to cooperate with audits that will be undertaken in reasonable business hours and after reasonable notice.

ALUMATE will invest resources in random and risk-based audits of the activities of Participants to ensure compliance with commitments made as part of the scheme. A strong and well-resourced audit regime is essential to protect the credibility of the scheme and the interests of Participants. This means that, in any one year, a significant subset of Participants is likely to be audited. An audit involves an assessment of adherence with the requirements of this document. An audit handbook will be developed to provide more detail on how assessment of compliance with commitments made as part of the scheme will be applied consistently to all Participants.

A Participant who fails to cooperate with an audit will be asked to explain why their Participant status should not be revoked. An explanation which is either insufficient or inappropriate will result in action that may include revocation of Participant status.



Audit types

ALUMATE will audit participants regularly or at specific dates during daytime business hours. ALUMATE will conduct desk reviews of accredited Participants, audits at the Participant's location or both where it deems this necessary.

Participant cooperation

During a desk review or audit, ALUMATE may request access to key personnel and supporting documents that it deems necessary to substantiate the information provided by the Participant. The participant must facilitate the review/audit requirements in an effective and efficient manner. Failure to meet any of the review/audit requirements by the participants may result in action that may include revocation of Participant status.

The participant is required to make reasonable arrangements to accommodate the audit team during audits.

Audit frequency

The frequency of reviews/audits will be at the discretion of ALUMATE.

Confidentiality disclosure

ALUMATE will treat all information and documents obtained during the review/audit as confidential. Disclosure of sensitive audit findings and observations will be restricted to audit personnel and ALUMATE senior management and will not be shared with other participants.

# 5.3 Revocation of Participant status

ALUMATE, acting reasonably, may revoke Participant status, giving 30 calendar days notice, where a Participant has materially breached the requirements of this document.

The audit handbook will provide full details of this process. An important principle is that Participants will be provided with warnings and opportunities to rectify non-compliance.

# 5.4 Resignation of a Participant

A Participant may resign from the scheme by giving 30 calendar days notice in writing to ALUMATE.

A Participant may immediately resign from the scheme upon changes to the Guidelines, which it believes may have a detrimental impact on it, by giving notice in writing to ALUMATE.

# 5.5 Period before re-applying

When an application is rejected, ALUMATE will determine the timeline for the application to be re-submitted.

Where Participant status is revoked, the business or organisation can re-apply for status as a Participant after at least 12 months have elapsed.



# PART B – REQUIREMENTS FOR BRANDING OF THE ALUMATE PRODUCT STEWARDSHIP SCHEME

#### **PLEASE NOTE:**

Participation in the Product Stewardship Scheme is voluntary.

A business or organisation that joins the scheme is required to comply with commitments that apply to them.

# 1. Purpose of branding

The purpose of branding for the scheme is to:

- promote the scheme within the supply chain and to consumers
- enable Participants to communicate their commitment to recycling, or support for the recycling of end-of-life Aluminium Product.

It is important that the brand is applied consistently and appropriately in order to build a strong, recognisable and credible image of the scheme.

# 2. Who can use the Alumate scheme's brand?

# 2.1 Participants

All Participants in the scheme are required to promote the scheme.

The Guidelines for the Product Stewardship Scheme give permission for Participants in the scheme to use the scheme's logo and specify the conditions that apply to that usage. ALUMATE may make other specified communication tools available for Participants to use.

Electronic versions of the logo, the Guidelines and any other specified communication tools provided by ALUMATE are available to Participants free of charge.

Participants in the scheme can use the scheme's logo and any other specified communication tools without further approval from ALUMATE. The logo is provided to Participants on joining the scheme.

## **Cessation of Participant status**

If a business or organisation ceases to be a Participant in the scheme, for whatever reason, then the business or organisation is required to stop using the logo and any other of the specified communication tools immediately. This will require removing the logo wherever it has been applied, e.g. on stationery and on vehicles and equipment. The business or organisation will be responsible for the costs related to the removal of the logo.



# 2.2 Non-Participants

Non-Participants are not generally permitted to use the scheme's logo or specified communication tools. Non-Participants involved in the supply chain that wish to use the logo should write to ALUMATE to seek permission to use a separate specific logo for this purpose. For example, the separate specific logo could be provided to organisations, such as manufacturers of products, to acknowledge the environmentally sound use of end-of-life aluminium product.

The written request should describe the purpose, the target audience and the media to be used, specifying the publications in which the logo will be published. In deciding whether to give permission, ALUMATE will consider the information provided and whether the proposed use will be in the interests of the scheme.

ALUMATE retains the right to revoke permission and to recover the logo provided as the result of such a request if the logo is not used in accordance with the scheme's Guidelines or with other conditions set by ALUMATE.

# 3. How to use the logo

Use of the scheme's logo must comply with the appropriate uses and context set out in this Section and with the technical specifications set out in Section 5.

# 3.1 Appropriate uses

Stationery and publications

A Participant can incorporate the scheme's logo into a range of printed material including stationery, compliments slip, accounts, invoices, publications, promotional matter, electronic presentations such as PowerPoint, posters, banners, multimedia and websites.

Logo sticker

As appropriate to the business or organisation, stickers of the logo alone can be used on:

- new products or promotional material or packaging associated with new
- containers dedicated to the collection and/or transport of end-of-life product
- internal signage e.g. on walls
- external signage e.g. on walls, equipment, vehicles and trailers.

#### Other uses

Other uses are permitted provided they are appropriate, considering issues of context discussed at 3.2. If there is any doubt about what constitutes an appropriate use, advice should be sought.

#### 3.2 Context

Participants are required to consider the context in which the scheme logo is displayed and to ensure that the logo is always used in a manner that is consistent with the spirit and objective of the scheme.

For example, the disposal of end-of-life aluminium product to landfill is not consistent with the scheme's objective and any association between the scheme's logo and the



disposal of end-of-life aluminium product to landfill is to be avoided as it is contrary to the scheme's objective.

Examples of contexts where a logo could be applied:

- in association with new product
- on a wall, beside a collection point dedicated to end-of-life
- on the side of a truck operated by a Participant.

Examples of where a logo should not be applied are:

- in association with types of products that are not included in the scheme
- on the side of a skip or a truck that is, or may be, used to collect general waste
- on the side of vehicle that is, or may be, used to deliver end-of-life to a landfill or on a skip used to collect general waste.

A Participant should seek advice from ALUMATE if there is any doubt about the appropriateness of a context in which the logo is proposed to be used.

#### 4. OTHER CONSIDERATION

#### 4.1 Permission to use the scheme materials

Participants have permission to:

- print and reproduce the scheme's logo and specified communication tools, including the Guidelines, in unaltered form, and
- use these materials for business activities they conduct as Participants in the scheme and for purposes connected with their participation in the scheme.

#### 4.2 Audit

Adherence to the requirements that apply to the use of the scheme's logo, and specified communication tools, will be examined as part of any audit of a Participant for the purposes of the scheme.

#### 4.3 Costs

Participants are required to bear all the costs of:

- using the scheme's logo and other communication tools, including printing costs.

#### 4.4 Text and references

Description of the Product Stewardship Scheme

When describing the scheme, the preferred text is:

'Through the voluntary ALUMATE Product Stewardship Scheme, industry participants commit to increase the recycling and resource recovery of Australia's

end-of-life aluminium products and minimise environmental, health and safety impacts.'



#### Standard text

From time to time, ALUMATE may prepare standard text on specific topics and distribute the text to Participants for their use. In such instances, the standard text is not to be modified without the permission of ALUMATE.

#### Quoting text

The text provided by ALUMATE in communication tools is not to be changed when used in Participants' own publications.

# 4.5 Application for trademark

An application for Trademark of the logo will be lodged with IP Australia.

# 5. Technical specifications

In the interests of building a strong, recognisable and credible brand, all use of the scheme's logo must adhere to the technical specifications and constraints set out in this Section.

A copy of the requirements for branding of the Product Stewardship Scheme should be provided to graphic designers, printers and desktop publishers before they start relevant work.

(The technical specifications will be finalised by ALUMATE and will relate to topics such as:

- the correct form/s of the logo, in colour and in black or mono
- requirement for clear space around the logo to protect its integrity
- specifications for the colour/s to be used
- reversed colouring, provided there is sufficient contrast
- rules about presentation, e.g. not using light or pastel colours that do not provide sufficient contrast; not placing the logo on a background image or photograph; not editing any wording that forms part of the logo; not changing the font/s used.)



# PART C - ACTION PLAN TEMPLATE & COMMITMENTS

Action Plan for (insert n	ame of business):					
<b>Business street</b>	Street:	Town/City:	Postcode:			
address:						
Guidance on the Action Plan:						
The Action Plan should be a simple document, setting out the actions that the						
organisation will take, and the proposed timeline for those actions, to promote the						
scheme. It must also outline the timeline and the steps that the applicant proposes to						
undertake to meet its commitments under the scheme. An applicant can use this template						
or present the information in any form, e.g. a table or spreadsheet. Participants in the						
scheme are required to report annually on the implementation of this Action Plan and						
what was achieved and su		n Plan for approval. A	LUMATE will			
specify the timeline for th		T				
Actions to promote the s			e for action (or N/A)			
Briefly list actions to pror						
following examples are no	•	•				
<ul> <li>Incorporate the sci</li> </ul>	heme's logo on the					
company's station	ery (e.g. letterhead,					
business cards).		•				
• Include the schem	e's logo, information					
about the scheme	•					
	ite on the company's					
	ite on the company s	•				
website.						
<ul> <li>Include articles on</li> </ul>	the scheme in	•				
company newslett	ers.					
<ul> <li>Mention the schen</li> </ul>	ne in presentations at					
conferences and o						
include information	on about the scheme					
in conference mate						
Others – please specif		•				
• prease speem	<i>y</i> .					
		•				
•						
		•				



Actions to meet scheme commitments Briefly outline the steps proposed to meet your commitments under scheme.	Proposed timeline for action (or N/A)
•	•
•	•
•	•

#### **Distributors**

- a. take responsibility for the environmentally sound use of end-of-life aluminium product with retailers when consumers purchase the products
- b. deal only with collectors and recyclers accredited by ALUMATE as Participants in the scheme when disposing of end-of-life product

or

- where dealing with a non-accredited collector, ensure contractual arrangements specify that all end-of-life product are provided to an accredited recycler for environmentally sound use.
- c. deal ethically and transparently with consumers, specifically in relation to the fees and charges associated with the environmentally sound use of end-of-life, and
- d. undertake regular reviews of arrangements with collectors and recyclers.

(Where relevant, the specific commitments for additional categories will be added to the certificate.)



# (Insert logo) PARTICIPANT COMMITMENTS FOR RETAILERS Product Stewardship Scheme

(Insert name of Participant)
(Insert name of relevant categories)
(Insert date that status as a Participant was awarded)

As a Participant, we support the objectives of the Product Stewardship Scheme to:

- increase resource recovery and recycling and minimise the environmental, health and safety impacts of end-of-life generated in Australia, and
- develop Australia's recycling industry and markets for ALUMATE derived products.

We are committed to meet our obligations as a Participant in the scheme, as set out in the Guidelines.

#### 1. We commit to:

- deal transparently and ethically with others involved in the supply chain, including consumers.
- promote the scheme to the community, other businesses and organisations, including through the development and implementation of an individual Action Plan, a template Action plan is included in the application form.
- use the scheme's branding and logo and adhere to the conditions that apply to that use, as set out in Part B of the Guidelines.
- comply with relevant laws and practices, including those that apply to the environment and occupational health and safety; and
- co-operate with surveys that are undertaken from time to time, and with random or risk-based audits as instigated by ALUMATE. This includes retaining and, on request, providing to ALUMATE the documentation specified in the relevant guidance on documentation in these Guidelines.
- 2. All Participants in the scheme also commit to contribute to:
  - the environmentally sound use of end-of-life aluminium product.
  - elimination of the illegal dumping of end-of-life aluminium product.
  - elimination of disposal of end-of-life aluminium product to landfill (except where
    no viable alternative is available and subject to state and territory legislation; for
    example, in rural and remote areas where appropriate recycling facilities are not
    available, or transportation costs are prohibitive).