



**FERRING PHARMACEUTICALS PTY LIMITED**  
AUSTRALIAN PACKAGING COVENANT (APC)  
2010-2015 ACTION PLAN



**A signatory to the  
Australian Packaging Covenant**



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## 1. EXECUTIVE SUMMARY

Ferring Pharmaceuticals Pty Ltd (Ferring) is a signatory to the Australian Packaging Covenant (APC), and was a signatory to both Mark I and Mark II of the National Packaging Covenant. For APC purposes Ferring Pharmaceuticals is classified as a “brand owner” and a member of the packaging supply chain.

As a member of the packaging supply chain and as a signatory to the Covenant, Ferring Pharmaceuticals has prepared this Action Plan for the period 2010-2015. In it we set out company-specific actions to adapt the Sustainable Packaging Guidelines to our product range for our packaging supply chains. The aim is to develop specific actions for the implementation of commitments we have made under the Covenant.

Each action is linked to the key performance indicators (KPI's) and targets as set out in the Covenant. Ferring Pharmaceuticals stores all documentation pertaining to the APC on the company's IT network and this will be extended to include this Action Plan and the Sustainable Packaging Guidelines (SPG) on completion. All of these records will be available at our office for review by the relevant parties on request.

As a producer of packaged goods globally, Ferring Pharmaceuticals is committed to resource conservation, product stewardship, and the principles of shared responsibility. Ferring Pharmaceuticals will continue to work with its packaging suppliers and retail customers to ensure that all the members of its packaging supply chain conform to the requirements of the Australian Packaging Covenant.

Ferring Pharmaceuticals has committed to addressing specific actions over the coming year and the lifespan of this plan in each of the three main areas i.e. Design, Recycling and Product Stewardship. In Section 5 we layout our timeline and order of priority for the actions we aim to undertake under the SPG implementation plan over the next twelve months.

The key goals for 2011 are;

1. Design - Review the Sustainable Packaging Guidelines (SPG) applied against our main packaging types. Liaise with head office and suppliers to determine what actions they have taken, or are taking in this area.
2. Recycling - Review the on-site waste management program to ensure all packaging material is recovered from the waste stream and directed towards recycling. This will apply to both our offices and our third party warehouse service provider.
3. Product Stewardship - Consider the inclusion of aspects of the SPG guidelines where we believe our suppliers can assist.

## 2. COMPANY PROFILE

### 2.1 OVERVIEW

Ferring Pharmaceuticals is a privately owned European based biopharmaceutical company, specialising in peptide hormones, particularly the posterior pituitary hormones, vasopressin and oxytocin. Ferring Pharmaceuticals is a research driven company devoted to identifying, developing and marketing innovative products in the fields of infertility, obstetrics, urology, gastroenterology, endocrinology and osteoarthritis.

Ferring Pharmaceuticals Pty Ltd, established in Sydney in July 2000, is the Australian subsidiary of Ferring Pharmaceuticals. The company is relatively small for this industry with a turnover of approximately \$16 million and a staff of 24 people nationally. Ferring Pharmaceutical imports in fully finished, ready to market packs, primarily from Europe, but is in the process of introducing some locally manufactured products in Australia.

The company's research activities and products are connected by a common thread focused on the provision of tailored treatments that work on the body's own terms to enable doctors to combat numerous diseases and medical conditions. The company has gained international recognition over the last 20 years for the creation of inventive medications that improve the quality of life of children and adults all around the world.

Ferring Pharmaceutical has its own production facilities in several European countries, in South America, Israel and China. With the acquisition of Bio-Technology General in 2005, it has capabilities in recombinant biotechnology as well as more traditional pharmaceutical manufacturing.

Ferring Pharmaceutical's marketing, medical services and sales teams, led by corporate headquarters in Saint-Prex, Switzerland, operate from more than 45 countries and employ more than 3,900 people throughout the world, while treatments are available in more than 70 countries. This expansion has allowed for a double digit annual growth rate over the last two decades.

Ferring Pharmaceuticals' R&D projects complement our product portfolio and will add a new generation of products to some of our most successful specialty brands. R&D facilities are located in Denmark, Israel and California, USA. We are committed to a future where it will continue to provide new and innovative medicines by utilising existing and acquired skills and the development of pioneering technologies and, where necessary, through partnerships with academic institutes and other companies.



## 2.2 FERRING'S PRODUCTS: AN OVERVIEW

Ferring Pharmaceuticals is a supplier of pharmaceutical medicines. It owns a number of brands including:

- |             |                           |
|-------------|---------------------------|
| • Duratocin | carbetocin                |
| • Firmagon  | degarelix                 |
| • Minirin   | desmopressin acetate      |
| • Norprolac | quinagolide hydrochloride |
| • Octostim  | desmopressin acetate      |
| • Pentasa   | mesalazine                |
| • Zomacton  | somatropin                |

Products are warehoused in Sydney and physically distributed to all States by its warehousing partner, Linfox Pharmatrans Warehousing and Distribution Pty Ltd ([www.pharmatrans.com.au](http://www.pharmatrans.com.au)) which has specialist experience in the pharmaceutical / hospital health care industries.

Pallets of stock are delivered from the docks or airport by a freight forwarding company directly into the distributor's warehouse for storage.

Ferring Pharmaceuticals products have specific temperature storage requirements including, in some cases, refrigeration. The warehouse is approved by the NSW Department of Health according to the Code of Good Wholesaling Practice

Individual products are received in packs approved by the TGA under the provisions of the Therapeutic Goods Act. These packs may not be altered without TGA approval.

Products are distributed to customers either via hospital or community pharmacies. Packaging waste is removed from hospitals according to their specific and highly regulated waste management practices. Waste associated with products distributed via a community pharmacy is likely to end up in the community. Recyclable materials thus could potentially be recycled using the kerbside recycling programme. However, because pharmaceutical products contain active medicinal substances which may be very potent or indeed toxic, recycling of their primary packaging is not possible.

Where Ferring Pharmaceuticals is required to destroy any product, it uses a secure waste management service provided by its warehouse partner. Destruction by high temperature incineration is documented in accordance with regulatory requirements.

## 2.3 ENVIRONMENTAL INITIATIVES

The company's commitment to the National Packaging Covenant commenced with the Covenant Mark I and continued with the re-signing of the new and strengthened Covenant on June 6, 2007. On September 20, 2010 FFPL submitted its signatory commitment form for the new Australian Packaging Covenant.

As Ferring Pharmaceuticals operates in the pharmaceutical industry, most elements of product packaging and labelling are focussed on preserving the quality of the pharmaceutical and minimising the risk of harm. Recycling of pharmaceutical packaging is therefore very limited in its potential scope. Likewise, design of product often requires the use of composite packaging materials to ensure product stability.

Notwithstanding this limitation, the 2009-2010 Annual Report outlined key actions that Ferring Pharmaceuticals has implemented to help achieve the Covenant targets and goals while demonstrating its own corporate responsibility in marketing and distributing its products. The 2010 – 2015 Action Plan for the Australian Packaging Covenant aims to build on these actions.

Performance versus plan is monitored on a six monthly basis by the company's Safety, Health & Environment Committee.

The Australian Packaging Covenant is very focused on the key areas of Design, Recycling and product Stewardship. Ferring Pharmaceuticals recognises that a cooperative approach between industry and all sphere of government is essential to achieve a nationally consistent approach to the lifecycle management of consumer packaging and paper, including its recovery, utilisation and ultimate disposal.

Ferring Pharmaceuticals is committed to the ethic of shared responsibility for the lifecycle of their product range.

### Design

Most of FPPL's products are imported pre-packaged in packs approved by the TGA under the provisions of the Therapeutic Goods Act and there are not many opportunities to influence the design of the packaging. The exception is the packaging on products manufactured in Australia. In 2008-2009 Ferring Pharmaceuticals launched the WetAlert® Enuresis Alarm and the ECoPP (Environmental Code of Packaging Principles) was used in the design of the packaging. Ferring Pharmaceuticals recommends reuse of the packaging as a storage container and ensured that the components were recyclable and labelled with the appropriate recycling logo.

### Distribution

Ferring Pharmaceuticals' products are warehoused in Sydney and physically distributed to all States by our warehousing partner, Pharmatrans Warehousing and Distribution Pty Ltd. Pharmatrans has also reviewed and implemented available options to reduce packaging waste. As part of our commitment to the APC, Ferring Pharmaceuticals will request Pharmatrans to regularly update Ferring on any developments in their warehousing and distribution operations that have an impact on the level of recycling or recovery that takes place as part of their operations.



## **Disposal**

Ferring Pharmaceuticals' products are distributed to customers either via hospital or community pharmacies. Packaging waste is removed from hospitals according to their specific and highly regulated waste management practices.

Consumer waste has been reduced by providing consumer medicine information electronically, where possible replacing package inserts, and allowing patients to access information online or as appropriate via the community pharmacy. Due to the nature of our products, and the small amount of packaging placed on the Australian market as a proportion of our global operations, it will prove very difficult to have any of the packaging adjusted for the Australian market only, and even then due to the nature of the product it will more than likely still be required to be disposed of rather than recycled.

## **Recycling and Reprocessing**

Waste associated with products distributed via a community pharmacy is likely to end up in the community. Recyclable materials thus could potentially be recycled using the kerbside recycling programme. However, because pharmaceutical products contain active medicinal substances which may be very potent or indeed toxic, recycling of their primary packaging is not possible.

### 3. COVENANT CONTACT OFFICER

Dr. Anna MacIntyre, Managing Director is responsible for Ferring Pharmaceuticals Pty Ltd's commitment to the Australian Packaging Covenant. Dr. MacIntyre has endorsed this Action Plan for the period 2010 - 2015.

Dr. MacIntyre's contact details are as follows:

Ferring Pharmaceuticals Pty Ltd  
Suite 2, Level 1, Building 1  
Pymble Corporate Centre  
20 Bridge Street  
Pymble NSW 2073

Phone: 02 9497 2305  
Mobile: 0414 237 293  
Email: [anna.macintyre@ferring.com](mailto:anna.macintyre@ferring.com)

[www.ferring.com.au](http://www.ferring.com.au)

#### 3.1 OUR APC TEAM

Ferring Pharmaceuticals has carried out a detailed review of the skills required to meet the requirements of the Australian Packaging Covenant. We have created a team made up of the following to work on this key project as part of our ongoing efforts to address packaging:

<b>Name:</b>	<b>Responsibility:</b>
Dr. Anna MacIntyre	Managing Director
Safety Health & Environment Committee	Performance Review
Greenstreets Environmental Resources Ltd	Consultants

The APC team is responsible for developing an internal project plan to co-ordinate all tasks required to implement the Action Plan.

The team's induction to the APC requirements included:

- Training program for Dr MacIntyre at our premises facilitated by our consultants;
- Attendance at all APC workshops during the development of the APC Action Plan requirements.

This training provided an overview of the Australian Packaging Covenant, the Sustainable Packaging Guidelines, and the reporting requirements for Ferring Pharmaceuticals as a global company with a local presence.

This Action Plan is to be followed up by regular meetings of the APC team where we will continue to address the issues raised throughout this plan. The team will endeavour to have a timely implementation of the Action Plan and will ensure data is stored in an auditable manner in our in-house APC audit database.



## 4. SCHEDULE FOR PACKAGING REVIEWS

Ferring Pharmaceuticals has identified that packaging type is the most appropriate method to review packaging. We have allocated the staff, time and systems necessary to ensure this is carried out on an ongoing basis.

### 4.1 TYPES OF PACKAGING USED

Ferring Pharmaceuticals' products use the following types of packaging in accordance with the regulatory and stability requirements for the products:

- Glass bottles
- Plastic bottles
- Plastic closures including those incorporating a metered dose device
- Small graduated plastic tubes
- Glass ampoules
- Thermoformed trays for ampoules
- Foil sachets
- Solid cardboard boxes
- Corrugated cardboard outers
- Self adhesive labels

### 4.2 TIMETABLE FOR REVIEW

An initial review of our key packaging material – Cardboard - was carried out as part of the preparation of this Action Plan. On the basis of this initial review, we have determined the following target Timetable for Review:

Review Period:	% of Product Lines Reviewed	
	Existing	New
1/4/2011 – 31/3/2012	50%	50%
1/4/2012 – 31/3/2015	100%	100%

## 5. ACTION PLAN

### 5.1 INTRODUCTION

Our APC team have worked collectively to review existing systems and procedures to assist in the development of a baseline for Action Plan indicators, and also to identify any gaps that exist in current reporting systems. This has provided a list of actions for the implementation of the Plan over the next twelve months and the lifetime of this Plan. These are set out below and are not exhaustive and may change over the life of this plan.

Our action plan is split to show the actions we will take under the three main headings:

- Design;
- Recycling; and
- Product Stewardship

A summary of the actions is also provided in the Action Plan Tables section.

### 5.2 DESIGN

#### 5.2.1 COVENANT GOALS

For Ferring Pharmaceuticals, the goal is to look at optimising packaging to use resources efficiently and reduce environmental impact without compromising product quality and safety. In order to do this, Ferring Pharmaceuticals has committed to review existing procedures for new product procurement to see if it is possible for its Head Office and suppliers to provide information for the requirements of the Sustainable Packaging Guidelines (SPG).

#### 5.2.2 OUTCOME

The outcome should be packaging designed to:

- Avoid or minimise the use of materials and other resources;
- Optimise recyclability and recycled content; and
- Reduce litter impacts.

As a pharmaceutical company, Ferring Pharmaceuticals' requirements for the product to be tamper proof and secure, as well as the potential contamination of the packaging from the contents, leaves very few opportunities for Ferring Pharmaceuticals to influence the design of the packaging in the direction of its recyclability if this were to in any way effect the requirements of the Therapeutic Goods Act (TGA).



### 5.2.3 KEY PERFORMANCE INDICATOR

The Key Performance Indicator for design will be evidence that Ferring Pharmaceuticals has requested information from our Head Office regarding the Sustainable Packaging Guidelines (SPG) for design and procurement of packaging.

### 5.2.4 CURRENT AND PLANNED ACTIONS

Ferring Pharmaceuticals has commenced the review of all packaging using the SPG guidelines.

We have determined that it will take twelve months (to April 2012) to review 50% of all current packaging and will aim to have implemented procedures for packaging reviews in new products using the SPG guidelines by 2015. Our Head Office will be familiar with the requirements of packaging compliance through our operations worldwide, and the Sydney office will liaise with them to determine what changes / developments they may be using to implement the Sustainable Packaging Guidelines.

Ferring Pharmaceuticals has integrated third party consulting, software and training to this project so every member of our team is fully resourced to carry out the tasks required. This aids with the development of our team and procedures, and backing documentation. We are using standardised templates developed specifically for this project.

The reviews of the packaging on our selected packaging types will be carried out between April 2011 and March 2012, and all 63 questions will be documented for each type. A full audit trail will be available for both compliance and substantive audits.

Ferring Pharmaceuticals complies with a wide range of global reporting requirements in relation to our product and packaging, and the company will review these guidelines to determine if there are overlaps with the Sustainable Packaging Guidelines.

## 5.3 RECYCLING

### 5.3.1 COVENANT GOALS

For Ferring Pharmaceuticals, the goal for recycling is to make a contribution to improved recovery of packaging by having on-site recovery systems for recycling of used packaging and, to consider a policy to purchase products with a recycled material content. As we mainly receive prepacked goods from overseas, and our product requires a high level of secure, and in many cases composite packaging, it is difficult for Ferring Pharmaceuticals to consider recycled material content other than in the outer cardboard cartons used by our warehouse partner for distribution.

Over 90% of our packaging is materials that can be recycled i.e. cardboard and glass, however restrictions on the disposal of used packaging will mean the majority of this packaging will not be recycled.

Ferring Pharmaceuticals' offices are one of the only areas where we can influence our impact on the environment and we will ensure to apply the highest standards in our office, in relation to the recycling of general office waste and paper, to ensure wherever we can make a difference, we will take every opportunity to do so. A Buy Recycled Policy will be considered as one of the initial actions in relation to recycling.

### 5.3.2 OUTCOME

The outcome should be:

- Improved recovery of recycled materials from the premises of Ferring Pharmaceuticals; and
- Increased secondary markets for recovered packaging materials.

### 5.3.3 KEY PERFORMANCE INDICATOR

The Key performance indicator for recycling will be evidence that Ferring Pharmaceuticals is implementing the on-site recovery of packaging through documentation provided from our waste collectors. As our products are handled by a third party specialist pharmaceutical warehouse provider, we have very little influence on the recycling regime within our third party service providers. However, we will endeavour to ensure they are aware we are signatories to the Australian Packaging Covenant and the obligations regarding recycling that come with membership.

### 5.3.4 CURRENT AND PLANNED ACTIONS

The company will determine if it is possible to introduce a Buy Recycled Policy. We will also look at ensuring our offices manage their waste in a manner that ensures any recyclable materials within the office i.e. toner cartridges, paper, plastics etc, actually end up in the recycling chain.

The company will look to source a greater level of consumables for the office from a buy recycled perspective, using local firms or websites such as EcoBuy to assist with this transition.

## 5.4 PRODUCT STEWARDSHIP

### 5.4.1 COVENANT GOALS

The goal for Product Stewardship is that Ferring Pharmaceuticals show a demonstrated commitment to product stewardship through working with third parties.

### 5.4.2 OUTCOME

The outcome should be:

- To improve the design and recycling of packaging; and
- Reduce the overall level of litter created by packaging.

### 5.4.3 KEY PERFORMANCE INDICATORS

The key performance indicators for product stewardship are;

- Have formalised procedures in place to work with others to improve design and recycling of packaging;
- To engage in other initiatives that show product stewardship such as education, sponsorship of initiatives etc; and
- To reduce the occurrence of litter in their operations and encourage clients to properly dispose of the packaging on products to remove them from the litter stream.

### 5.4.4 CURRENT AND PLANNED ACTIONS

The APC team will look to liaise with our Head Office to assess what sustainability initiatives they are currently undertaking or are planning to undertake, and how Ferring Pharmaceuticals Australia can be part of these initiatives.

## 5.5 ACTION PLAN TABLES

### 5.5.1 DESIGN

Covenant Goal	Actions	Responsibility	Targets	Timeline
1. Design - optimise packaging to achieve resource efficiency and reduction in quantity required. The design efforts should reduce environmental impact without compromising product quality and safety.	Review packaging by type.	APC Team		April 2015
	- Review existing products to ensure they meet SPG guidelines		50% reviewed	31st March 2012
	- Review purchase procedures to determine where SPG guidelines can be introduced			31st March 2012
	- Implement changes from initial review which ends April 2012 to ensure all products meet SPG requirements		100% products	31st March 2012
	- Implement adequate audit procedures and tools to record the results of the SPG reviews.		Implement system to record SPG reviews and links to other standards	December 2012

### 5.5.2 RECYCLING

Covenant Goal	Actions	Responsibility	Targets	Timeline
2. Recycling - Improved recovery of packaging by having on-site recovery systems for recycling of used packaging and, to consider a policy to purchase products with a recycled material content.	Review and implement improved on-site recycling and buy recycled policies:	APC Team		April 2015
	- Document baseline recycling information for on-site packaging waste		Baseline data	31st March 2012
	- Report annually on recycling of on-site packaging waste			June 2012 – June 2015
	- Document baseline recycling information for office waste recycling		Baseline data	31st March 2012
	- Identify opportunities for office waste recycling (additional waste streams)			April 2015
	- Examine the possibility of introducing a Buy Recycled policy			31st March 2012
	- Document baseline information on Buy Recycled quantities		Baseline data	December 2013
	- Identify opportunities for improvements in Buy Recycled quantities			April 2015

### 5.5.3 PRODUCT STEWARDSHIP

Covenant Goal	Actions	Responsibility	Targets	Timeline
3. Product Stewardship - Show a demonstrated commitment to product stewardship through working with third parties	Contact Head Office to determine what actions they have taken or are implementing.	APC Team		31st March 2012
	Implement questionnaires into purchasing policies.			April 2012