

Nintendo Australia Pty Limited The National Packaging Covenant

**REPORT ON
ACTION PLAN 2008 – 2011**

**REPORT PERIOD
JULY 2008 – JUNE 2009**



**Nintendo Australia Pty Limited
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Wii™

NINTENDO DS®

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EXECUTIVE SUMMARY

This report applies to the first year in the 2008 – 2011 Action Plan.

Nintendo Australia has been a signatory to the National Packaging Covenant for seven years. The establishment of an Environmental Committee to manage the requirements of the Covenant has resulted in effective environmental considerations not only with respect to packaging but also in many other areas of business.

Nintendo Australia's commitment to minimizing the environmental impact of its product packaging is demonstrated by a continuous improvement plan and the resulting establishment of baseline data.

As an importer of pre-packaged consumer goods Nintendo Australia focuses primarily on what we have control over with regards to recycling, reusing and reducing product packaging materials. Communication of our commitment to the National Packaging Covenant to our Head Office also ensures their awareness of our requirements for environmentally friendly packaging materials.

Over the last three reporting periods (2006-2007, 2007-2008, 2008-2009) we have undergone a significant increase in sales growth which has increased the total amount of product packaging used (measured by weight). At the same time the packaging-to-product ratio has improved from 0.73:1 to 0.56:1 to 0.44:1 respectively. This is partly attributed to a change in the mix of product sold during these years and partly due to packaging design.

We continue to maintain a high percentage of recyclable material in our packaging with 99.95% of the weight of our packaging being recyclable. Nintendo Australia works closely with packaging suppliers to ensure that packaging materials produced here in Australia are made of recycled and recyclable materials wherever possible.

The Environmental Committee also introduced a number of initiatives with respect to protecting the environment by enhancing the recycling of post-consumer waste and education of staff on our recycling program, the refinement of our e-waste recycling program, a large number of halogen down lights throughout the building have been replaced with energy efficient alternatives, and other small but effective steps have been taken to reduce the energy consumption of our operations.

INTRODUCTION TO THE NATIONAL PACKAGING COVENANT

The National Packaging Covenant Objective¹

The objective of the Covenant is to reduce environmental degradation arising from the disposal of used packaging and conserve resources through better product design and production and the re-use and recycling of used packaging materials.

Strengthened Covenant¹

The National Packaging Covenant (Covenant) has been the leading instrument for managing the environmental impacts of consumer packaging in Australia since 1999. It is the voluntary component of a co-regulatory arrangement based on the principles of shared responsibility through product stewardship, between key stakeholders in the packaging supply chain and all spheres of government - Australian, State, Territory and Local.

The Covenant was extensively reviewed throughout 2004 and revised in response to the findings of the Evaluation of The National Packaging Covenant and Consultation Process and a general agreement by all stakeholders that the model needed to be significantly strengthened if it was to continue.

At their meeting on 1 July 2005 the Environment Protection and Heritage Council agreed to the proposal for a strengthened Covenant for a term of five years to commence when the current Covenant expired on 14 July 2005.

Overarching Targets for 2010¹

The overarching targets for 2010 were developed to demonstrate clearly whether the Covenant is meeting its goals and contributing to better lifecycle management of packaging. All signatories to the Covenant will work together to deliver these targets. The Covenant's three overarching targets for 2010 are:

- A National recycling rate of 65% for post consumer packaging (comparing to the 2003 baseline of 48%), with contributions from:
 - Paper and cardboard 70-80% (currently at 64%)
 - Glass 50-60% (currently at 35%)
 - Steel 60-65% (currently at 44%)
 - Aluminium 70-75% (currently at 64%)
 - Plastics 30-35% (currently at 20%)
- No further increase in the amount of packaging waste disposed to landfill over the current (2003) baseline
- A recycling rate of 25% for materials that are either not currently recycled or are recycled at very low rates (currently 10%)

Environmental Code of Practice for Packaging (ECoPP)¹

The purpose of the Code and Guidelines is to demonstrate environmental stewardship in packaging design and selection. Its application will be via packaging designers and manufacturers, brand owners, retail buyers and product importers.

Accordingly the objectives of the Code and Guidelines are to:

1. Protect and deliver goods efficiently with the minimum environmental impact.
2. Use resources (including materials and energy) more efficiently.
3. Reduce the amount of waste and litter generated by packaging through facilitating reuse or recycling.
4. Minimise negative impacts of packaging and packaged products on humans and the natural environment.

5. Ensure effectively and clearly documented practices are in place to address environmental concerns in the product development and review process for packaging and packaged products.

More broadly, the Code and Guidelines should be seen as tools for the design and manufacture of innovative packaging that meets the sometimes conflicting demands of the market, consumer protection and the environment.

¹ The National Packaging Covenant Strategic Partnerships in Packaging, National Packaging Covenant Industry Association, July 2005

HISTORY OF NINTENDO AUSTRALIA

Introduction

Nintendo Australia Pty Limited (**Nintendo Australia**) established in 1994, is the local head office of Nintendo Co. Ltd. of Kyoto, Japan.

Nintendo Australia became a signatory to The National Packaging Covenant in August 2002 and recognises the importance of minimizing the effects of packaging materials on the environment.

Nintendo Australia supports the new strengthened Covenant and re-signed The Covenant on 27th September 2005.

In submitting these Action Plans, Nintendo Australia has committed to the principles of The National Packaging Covenant and continues to strengthen our internal Environmental Committee to review, action and promote a responsible approach to the protection of the environment.

The Company

Recognised as the worldwide leader and innovator in the creation of interactive entertainment, Nintendo Co. Ltd. manufactures and markets hardware and software for its popular home video game systems and portable hand held game systems.

Nintendo Co. Ltd. was founded in 1889 as a manufacturer of "Hanafuda", Japanese playing cards and became the first manufacturer of western style playing cards in Japan. Nintendo Co. Ltd. had many successful years manufacturing various types of playing cards and games before branching into the electronic toy industry.

Nintendo Co. Ltd. introduced electronic technology into the toy industry for the first time in Japan in 1970. The following years saw the development and innovation of video games and the birth of the video games industry.

Nintendo has operations in the USA, Canada, Germany, France, Spain, the Netherlands, Belgium, Korea, China, Taiwan and Australia. Today, Nintendo Co. Ltd. is recognised as the leading software based Entertainment Company in the world.

Nintendo Australia was formed in 1994. Prior to this, for seven years Nintendo products were available in Australia through a distributor. Nintendo Australia currently employs 81 permanent staff at the Head Office in Scoresby, Victoria.

Nintendo Group Worldwide develops, manufactures, markets and distributes video games. Icons like Mario, Zelda and Pokémon are unique to Nintendo video games systems and world recognised. The home video games machines (Nintendo Entertainment System, Super Nintendo, Nintendo 64, GameCube, Wii) are console systems that connect to a television and are played using a hand controller and game (cartridge or disc). Our newest such console system, the "Wii" was released in early December 2006 and has sold over 750,000 consoles. Wii Fit, a fun and innovative way to work out in the comfort of your own home was launched in May 2008 and has sold in excess of 520,000 since its release.

The portable video game systems Nintendo DS Lite and the newly released Nintendo DSi are battery operated hand held consoles using Game Card (i.e. cartridge) based games. With the introduction of Nintendo DS in February 2005, Nintendo DS Lite in June 2006 and more recently Nintendo DSi in May 2009, Nintendo Australia had sold over 1 million Nintendo DS units since it was introduced in 2005, and over 100,000 Nintendo DSi units since it was introduced in May 2009. The success of the Nintendo brand is due to the production of high quality products, high entertainment value and innovative games and systems.

In addition to the game consoles, Nintendo Australia has also sold 3.3 million software units in the 2008-2009 financial year. The range of products currently in the Australian market includes Wii, Nintendo DSi, Nintendo DS Lite, and a range of software titles and styles including Adventure, Action, Racing, Role play, Classic and Sports games as well as various accessories for each platform.

Environmental Policy

Nintendo Australia is aware of the necessity to comply with all Government environmental legislation to minimise waste and increase efficiency, reduce energy consumption, minimise the effects of our operations on the environment, establish systems for and encourage recycling, educate and encourage staff to be environmentally aware and promote responsible environmental management to our suppliers and dealers.

Nintendo Australia is committed to ensuring that environmental considerations are included from the planning and development stages through to the end of the working life and disposal of the product. With these considerations in mind Nintendo Australia will seek to have as minimal impact on the environment as is commercially possible.

Current Status

Nintendo Australia products are imported from our Head Office in Japan and manufacturing plants throughout Asia. Most of our products are imported as finished goods ready for retail sale. These products are designed and manufactured to meet strict quality and safety standards.

Nintendo Australia's policy is to comply with environmental regulation wherever applicable and to use recyclable packaging materials wherever possible.

Nintendo Co. Ltd. continually reviews packaging design and materials for efficiency, minimization of waste and impact on the environment.

In order to fully understand the types and quantities of packaging materials used and identify areas for improvement, an audit of the types of packaging materials used for our current products was performed in our first year as a signatory to The Covenant. In addition to identifying the types of materials used, investigation was made into ways of measuring and recording the quantities of these materials. An ongoing part of our Action Plan has been to record quantities of waste currently generated and implement ways to reduce this by eliminating, reusing and recycling these materials.

A more effective recording system was created and implemented during the 2006/7 reporting period.

The current packaging materials in use are:

Cardboard	-	Retail product master
	-	Cartons Shipper/Inner
	-	Point of Sale Sleeves
Paper	-	Consumer product information
	-	Shipping and handling information
	-	Labels
Plastic	-	Bags
	-	Inner Tray
	-	Game cases
	-	Strapping Buckles
Polyethylene	-	Stretch film
	-	Bubble wrap
	-	Pallet Bags/liners
Polypropylene	-	Strapping
Wood	-	Treated pine pallets
	-	Hardwood pallets
Wire	-	Vinyl coated ties

Major Achievements

Since becoming a signatory to the National Packaging Covenant, Nintendo Australia has implemented various collection facilities for the recycling of all recyclable packaging materials. A report on the quantity sent to landfill is presented to Nintendo Australia's Directors each month and a container for collection and recycling of cardboard has been brought onsite in order to increase efficiency and effectiveness of cardboard recycling.

During the last year, the recycling of end user material within the office has continued through the colour coded recycling system and the ongoing communications and updates between the Environmental Committee members and staff. Anecdotally, the level of compliance with the recycling system appears to be high.

Ongoing communications and updates between the Environmental Committee members and staff has been a contributing factor to the success of implementing these changes, and educating staff on how we dispose of packaging materials correctly.

Current Projects

Nintendo Australia is continuously working towards the current packaging KPIs and as such we continue to investigate recycling options for those few materials we use in the packaging process that are currently not recyclable. Further education programs are key to our current projects, especially to the Warehouse staff who ultimately handle the packaging material that enters Nintendo Australia. As a company we also continue to research topics other than Packaging to help the environment.

NPC KEY PERFORMANCE INDICATORS

The KPIs that are relevant to Nintendo are KPI 1, 6, 16, 21, 26, 27, 28 & 29.

KPI	REPORTING MEASURE	COMPANY MEASURE	RESPONSIBILITY	DATE DUE
<p>1. Total weight of consumer packaging (domestic & imported) sold per annum into the Australian Market and the total weight of products packaged.</p>	<p>1A. Report tonnes of packaging by material type & by source (local or imported).</p> <p>1B. Report tonnes of packaged product sold.</p> <p>1C. Report ratio of product to packaging (by weight).</p>	<p><i>Implemented 1A:</i> A reporting system that records the total quantities of products imported. Each packaging material within each product is then recorded separately to calculate the total weight of all the packaging material used for each product. Locally produced packaging is recorded separately. To calculate all locally produced packaging, a Packaging Check List Form is completed for every order placed with our printing supplier identifying the material used, quantity produced, and weight.</p> <p><i>Implemented 1B:</i> As stated in 1A, total quantity of products is recorded together with the weight of each product in order to calculate the total weight of packaged product.</p> <p><i>Implemented 1C:</i> The ratio of product to packaging (by weight) is included in each Annual Report.</p> <p>*Continue with all of the above recordings</p>	<p>Director of Operations (formerly Operations Manager)</p> <p>Warehouse Manager (formerly Warehouse Supervisor)</p> <p>Business Affairs Assistant</p>	<p>Ongoing 01/07/08 – 30/06/11</p> <p>Ongoing 01/07/08 – 30/06/11</p> <p>Ongoing 01/07/08 – 30/06/11</p>

KPI	REPORTING MEASURE	COMPANY MEASURE	RESPONSIBILITY	DATE DUE
<p>6. Total Weight, by type, of “non-recyclable” consumer packaging sold per annum into the Australian Market.</p>	<p>6A. Report tonnage of “non recyclable” packaging sold by material type and total.</p> <p>6B. Report total “non recyclable packaging” as a % of total packaging sold.</p>	<p><i>Implemented 6A:</i> A spreadsheet titled “Product Specification” records all materials that make up the packaging to all of our products, whether they are recyclable or non recyclable materials. Non recyclable materials are weighed and total quantity recorded. Continue with these recordings.</p> <p><i>Implemented 6B:</i> Each Annual Report includes total “non recyclable” packaging as a % of total packaging sold.</p> <p>*Continue with all of the above recordings</p>	<p>Director of Operations</p> <p>Warehouse Manager</p> <p>Business Affairs Assistant</p>	<p>Ongoing 01/07/08 – 30/06/11</p> <p>Ongoing 01/07/08 – 30/06/11</p>
<p>16. Percentage of signatories providing recycling collection facilities for post-consumer packaging generated on-site.</p>	<p>16A. Report on whether on-site recycling facilities are provided or not.</p> <p>16B. If yes, provide details.</p>	<p><i>Implemented 16A:</i> Reported that recycling collection facilities for post consumer packaging are in place on site.</p> <p><i>Implemented 16B:</i> Collection facilities are provided for the following materials:</p> <ol style="list-style-type: none"> 1. Wheelie Bins/Security Destruction - All paper materials 2. Bulk Bin - All cardboard materials 3. Commingle Bins - for aluminium and plastic materials 4. Toner Bins – For plastic toner materials 5. Bale Bags – Shrink wrap material 6. 18ltr Bins – Plastic Bags <p>Continue with these collections and; where applicable, the collection of each bin is now recorded and added to the database.</p>	<p>Director of Operations</p> <p>Warehouse Manager</p> <p>Operations Secretary</p>	<p>Ongoing 01/07/08 – 30/06/11</p> <p>Ongoing 01/07/08 – 30/06/11</p>

KPI	REPORTING MEASURE	COMPANY MEASURE	RESPONSIBILITY	DATE DUE
<p>21. Estimate tonnage of consumer packaging sent (a) for recycling and (b) to landfill from on-site collection facilities.</p>	<p>21A. Report on amounts of consumer packaging from on-site collection which is</p> <p>(i) Sent for recycling (tonnes and % of total waste); and</p> <p>(ii) Sent to landfill (tonnes and % of total waste).</p>	<p><i>Implemented 21A (i):</i> A disposal spreadsheet recording all recyclable packaging materials that are disposed of in quantity and weight in kilograms.</p> <p><i>Implemented 21A (ii)</i> The recording of the quantity and weight figures for each collection of landfill waste to record tonnes and total waste. This is reported monthly to Directors.</p>	<p>Director of Operations</p> <p>Warehouse Manager</p>	<p>Ongoing 01/07/08 – 30/06/11</p>
<p>26. Implementation of Buy Recycled Purchasing Policy or Practices.</p>	<p>26A. Report on whether the signatory has implemented a Buy Recycled purchasing policy or practices.</p> <p>26B. If yes, provide details and quantitative data where available.</p>	<p><i>To Implement 26A:</i> A buy recycled purchasing policy has been investigated; further assessment is required in this area in order to create a comprehensive policy that can be placed on the company intranet. This will include an extensive analysis of stationery suppliers.</p> <p><i>To Implement 26B:</i> Report on outcomes and quantitative data.</p>	<p>Business Affairs Assistant</p> <p>Purchasing Officer</p>	<p>Ongoing 01/07/08 – 30/06/11</p>
<p>27. Establishment of baseline performance data.</p>	<p>27A. Report indicative baseline data (where available), including qualifiers and assumptions.</p> <p>28B. Report established baseline data by 31 October 2009.</p>	<p><i>Implemented 27A:</i> Spreadsheets set up for the reporting of data. Nintendo will continue to report and update spreadsheets already in place and conduct an audit every 6 months. Include indicative baseline date in Action Plan where available.</p> <p><i>Implemented 28B:</i> Established baseline data is reported on in annual report.</p> <p>*Continue with all of the above recording</p>	<p>Business Affairs Assistant</p>	<p>Ongoing 01/07/08 – 30/06/11</p>

KPI	REPORTING MEASURE	COMPANY MEASURE	RESPONSIBILITY	DATE DUE
<p>28. Annual Reporting against Action Plan.</p>	<p>28A. Report to be lodged annually commencing 2009 for this new Action Plan. This is to outline progress against baseline data, individual Action Plan commitments, targets and timelines.</p>	<p><i>Implemented 28A:</i> Conduct regular audits (on a 6 months basis) of departments, checking their data recording process of all KPIs and targets to ensure that information is up-to-date and will reflect accurate provision of our company baseline data.</p> <p><i>*Continue to submit reports based on 2008-2011 Action Plan annually by 31st October each year.</i></p>	<p>Business Affairs Assistant</p>	<p>Ongoing 01/07/08 – 30/06/11</p>
<p>29. Demonstrated improvement and achievements against individual targets and milestones.</p>	<p>29A. Annual report to clearly demonstrate continuous improvements and performance against individual targets and timelines in Action Plan.</p>	<p><i>Implemented 29A:</i> Submitted Action Plan October 2008. Where applicable we will submit any revisions to this action plan by October 2009/2010. If no revisions or improvements then achievements will be reported in the annual report due annually October 2009-2011.</p>	<p>Business Affairs Assistant</p>	<p>November 2008/2009 and then October 2009-2011</p>

NPC KEY PERFORMANCE INDICATORS: RESULTS

KPIs 1,6,16,21,26,27,28 & 29.

KPI 1.

Objective:

Total weight of consumer packaging (domestic & imported) sold per annum into the Australian Market and the total weight of products packaged.

Reporting Measure:

1A. Report tonnes of packaging by material type and by source (local or imported)

1B. Report tonnes of packaged product sold

1C. Report ratio of product to packaging

Results:

1A.

Report tonnes of packaging by material type and by source (local or imported)

Material	July 2008 – June 2009		July 2007 – June 2008		July 2006 – June 2007	
	Imported	Local	Imported	Local	Imported	Local
Cardboard	1313.60	0.73	442.07	0.00	205.10	0.00
Paper	435.02	8.76	197.06	13.85	111.98	4.97
Plastic	431.39	0.00	244.20	0.00	131.12	0.00
Vinyl/Wire Tie	1.04	0.00	0.41	0.00	0.26	0.00
Foam	41.48	0.00	12.57	0.00	7.18	0.00
Sticker	0.91	0.06	0.26	0.058	N/A	N/A
Mixed Recyclable	276.24	0.00	51.54	0.00	N/A	N/A
SUB-TOTAL	2499.68	9.55	948.11	13.908	455.64	4.97
TOTAL TONNES	2509.23		962.02		460.61	

1B.

Report tonnes of packaged product sold.

Packaged Product	July 2008 – June 2009	July 2007 – June 2008	July 2006 – June 2007
Game Boy Advance SP	0.00	0.00	0.97
GameCube	0.00	0.00	1.52
Game Boy micro	0.00	0.00	0.00
Nintendo DS	243.50	229.44	132.16
Nintendo DSi	58.90	N/A	N/A
Wii	3014.10	1030.38	493.08
Wii Fit	2451.06	457.29	N/A
TOTAL TONNES	5767.56	1717.11	627.73

1C.

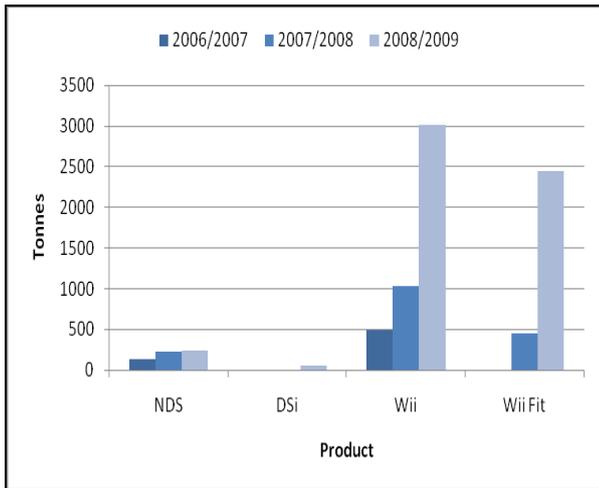
Report ratio of product to packaging (by weight).

	July 2008 – June 2009	July 2007 – June 2008	July 2006 – June 2007
Packaging Tonnes	2509.23	962.02	460.61
Product Tonnes	5767.56	1717.11	627.73
RATIO	0.44:1	0.56:1	0.73:1

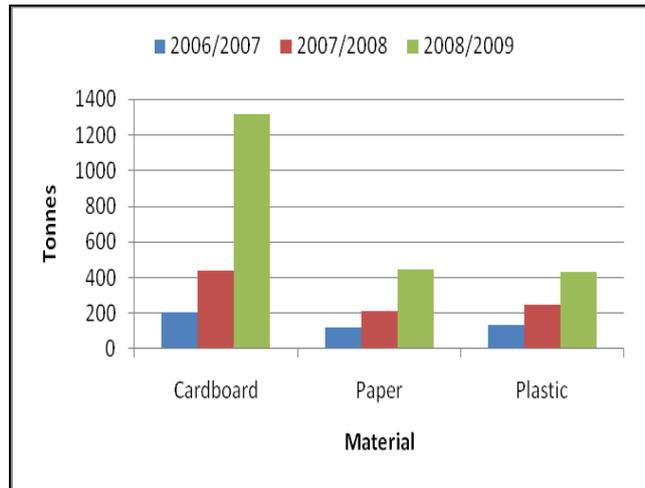
For every one tonne of packaged product there are 0.44 tonnes of packaging.

Summary:

The results in 1A and 1B are the reflection of the increased sales of the Nintendo Wii and Wii Fit and Nintendo DS Lite, and also the release of the latest version of the Nintendo DS the Nintendo DSi, all of which have comparatively light packaging in relation to the weight of the products alone. All four of these products have achieved outstanding sales results.



Weight (in tonnes) of product received by Nintendo Australia



Weight (in tonnes) of the 3 major packaging materials received by Nintendo Australia

Results from 1A and 1B show dramatic increases in the tonnage of both packaging and product sold into the Australian Market compared to our results in 2007-2008. The charts above give a graphical representation of the increase in both product, and consequently packaging that entered Nintendo Australia during 2008/9 compared to the amount that was received in 2007/8.

As shown in 1B, the weight of product imported by Nintendo Australia during the last reporting period was 5767.56 tonnes, an increase of 4050.45 on the previous period.

Considering 1C, there has been significant improvement in the ratio of packaging to product, which now stands at 0.44:1, down from 0.56:1 for the last reporting period. A large proportion of this can be attributed to the introduction of the Wii Fit which accounts for 42.50% of the total weight of product and has a packaging to product ratio of 0.22:1. 1C is also reflective of the fact that we package our product with the minimum amount of packaging required (whilst still ensuring that each product is protected and that the consumer receives the information that is required by industry guidelines and requirements by law).

KPI 6.**Objective:**

Total Weight, by type of “non-recyclable” consumer packaging sold per annum into the Australian Market.

Reporting Measure:

6A. Report tonnage of “non recyclable” packaging sold by material type and total.

6B. Report total “non recyclable” packaging as a % of total packaging sold.

Results:

6A. Report tonnage of “non recyclable” packaging sold by material type and total.

Imported Material	July 2008 – June 2009	July 2007 – June 2008	July 2006 – June 2007
Plastic	0.07	0.00	102.48
Vinyl/Wire Tie	1.04	0.41	0.26
Stickers	0.05	N/A	N/A
Foam	0.02	N/A	N/A
TOTAL TONNES	1.18	0.41	102.74

6B. Report total “non recyclable” packaging as a % of total packaging sold.

	July 2008 – June 2009	July 2007 – June 2008	July 2006 – June 2007
Non Recyclable Packaging (tonnes)	1.18	0.41	102.74
Total Packaging (tonnes)	2509.23	962.02	460.61
PERCENTAGE	0.05%	0.04%	22.30

99.95% of our total packaging is recyclable which is reflected in KPI 1 of our product stewardship and individual KPIs.

Summary:

In reports prior to 2007-2008 all plastic game cases were recorded as non-recyclable, which greatly increased the percentage of non-recyclable products used. However, these game cases are recyclable and this is reflected in the last two years results. The plastic of which these cases are composed is Number Code 5 PP Polypropylene and the recycling of this material can be used for brooms, brushes, rakes, compost bins, recycling crates, pot plants and motor vehicle parts.

KPI 16.**Objective:**

Percentage of signatories providing recycling collection facilities for post-consumer packaging generated on-site.

Reporting Measure:

16A. Report on whether on-site recycling facilities are provided or not.

16B. If yes, provide details.

Results:

16A & 16B.

Collection Facility	Material Type	July 2008 – June 2009	July 2007 – June 2008	July 2006 – June 2007
Visy	Cardboard	21.24	10.21	9.54
	Aluminium/Plastics (Comingle)	0.10	0.60	0.50
	Paper	2.93	3.24	3.37
Astron Plastics	Polyethylene (Shrink wrap)	3.27	2.25	0.20
Data shred	Cardboard	N/A	N/A	0.02
	Paper	N/A	N/A	1.94
	Plastics/Metals	N/A	N/A	0.22
Iron Mountain (Security Destruction)	Paper	0.84	5.73	N/A
Close the Loop	Toners - Plastics/Metals	0.08	0.053	0.04
TOTAL TONNES		28.46	22.08	15.83

Summary:

As these results show, Nintendo Australia has diverted 28.46 tonnes of materials from going to landfill.

During the 2006 – 2007 reporting period we arranged for one toner collection. This was increased to three collections during 2007 – 2008 reporting period and remained at three collections during the current reporting period. Our results show that 0.08 tonnes of normally deposited landfill plastics and metals have now been recycled and or reused by the toner collection company. Also, as shown, we have seen a significant increase in the amount of stretch wrap that is now being collected for recycling; this recycling scheme has proved to be a success.

KPI 21.**Objective:**

Estimate tonnage of consumer packaging sent (a) for recycling and (b) to landfill from on-site collection facilities

Reporting Measure:

21A. Report on amounts of consumer packaging from on-site collection which is

- (i) Sent for recycling (tonnes and % of total waste); and
- (ii) Sent to landfill (tonnes and % of total waste).

Results:

- (i) Sent for recycling (tonnes and % of total waste).

	July 2008 – June 2009	July 2007 – June 2008	July 2006 – June 2007
Tonnes Recycled	0.23	1.42	2.18
Over Produced Packaging	0.23	1.42	2.18
% of over Produced Packaging Recycled	100%	100%	100%

- (ii) Sent to landfill (tonnes and % of total waste).

	July 2008 – June 2009	July 2007 – June 2008	July 2006 – June 2007
Tonnes to landfill	0.00	0.00	0.00
Over Produced Packaging	0.23	1.42	2.18
% of over Produced Packaging Not Recyclable	0%	0%	0%

Summary:

These results show that compared to the previous reporting period we have again been able to lower the tonnage of packaging waste that was not used in our distribution process. We have also been able to maintain the fact that 100% of this is recycled when discarded. During this reporting period, when we had to dispose of excessive packaging it was all recycled through our implemented collection facilities. Our total over produced consumer packaging of 0.23 tonnes represents a negligible amount (0.009%) of our overall total packaging produced. Once again this means we continue to meet our internal objective that no more than 0.5% of our total packaging will be disposed of due to over production.

KPI 26.**Objective:**

Implementation of Buy Recycled purchasing policy or practices

Reporting Measure:

26A. Report on whether the signatory has implemented a Buy Recycled purchasing policy or practices.

26B. If yes, provide details and quantitative data where available.

Results:

26A. During this reporting period a Buy Recycled purchasing policy has not been implemented.

26B. Not applicable.

Note: Some general investigation has been conducted into purchasing recycled items, though the area of most progress has been stationery rather than packaging. Below are our most frequently ordered items of stationery that also have an environmentally safe option available. The environmentally safe option means that the product consists of recycled materials. It does not necessarily mean that the product is recyclable.

Product	Annual Current Cost	Annual Green Range Cost
A4 White copy paper*	13895.80	13895.80
Post it Notes 76x76	105.96	549.81
Post it Notes 73x123	108.36	360.95
Post it Notes 35 x48	44.80	48.12
Permanent Markers	207.01	330.78
Highlighters	254.27	254.78
Pens	179.60	416.90
Archive Boxes	411.96	411.96
Notebooks A4	405.67	729.56
Line Note Pads A4	34.20	59.80
Whiteboard Markers	194.34	386.78
Surface Wipes	17.68	17.68
Total	\$15,859.65	\$17,462.92
Increase in annual costs if all Green Range options chosen		\$1,603.27
Increase as a percentage		10.1%

Summary:

*Nintendo Australia already purchases 100% recycled office paper. Despite the obvious environmental benefits of buying such "Green Range" alternative stationery products, the purchase of recycled packaging materials would be aligned with the objectives of the Covenant.

This KPI is still ongoing. Further investigation is required in this area in order to create a comprehensive policy that can be placed on the company intranet. A new Purchasing Officer was appointed in June 2008 and purchasing has been consolidated giving greater control in this area. A review including a more comprehensive array of items rather than just stationery is being conducted by the Purchasing Officer.

KPI 27.

Objective:

Establishment of baseline performance data.

Reporting Measure:

27A. Report indicative baseline data (where available), including qualifiers and assumptions.

28B. Report established baseline data by 31 October 2008.

Results:

Baseline data that was reported on in our July 2007 - June 2008 report is our indicative baseline data, enabling us to give an accurate comparison report during this reporting period. In July 2007 - June 2008 the data that was recorded and reported as baseline data was relevant to KPIs 1, 6, 16, 21, 26, 27, 28 and 29.

Summary:

The results and outcomes that are available from this report will act as our baseline data for our next report that will cover the period July 2009 - June 2010.

KPI 28.

Objective:

Annual Reporting against Action Plan.

Reporting Measure:

Report to be lodged annually commencing 2008 outlining progress against baseline data, individual Action Plan commitments, targets and timelines.

Results:

Report submitted on 31st October 2009.

Summary:

A new Action Plan was submitted with the Annual Report on 31st October 2008. The Action Plan has become our new "living document" and any changes to this will be submitted by 31st October each year in conjunction with the related Annual Report. Collection and entry of data of our KPI requirements continues on a regular basis to allow us to submit our Annual Reports by 31st October annually until 2011.

KPI 29.

Objective:

Demonstrated improvement and achievements against individual targets and milestones.

Reporting Measure:

Annual report to clearly demonstrate continuous improvements and performance against individual targets and timelines in Action Plan.

Results:

Report submitted on 31st October 2009.

Summary:

Improvements and performance against individual targets and timelines in the 2008-2011 Action Plan are demonstrated by the presentation of data and other outcomes in annual reports submitted in October 2009, 2010 and 2011.

SUMMARY OF PRODUCT STEWARDSHIP AND INDIVIDUAL TARGETS

CATEGORY		OBJECTIVE	COMPANY MEASURE	RESPONSIBILITY	DATE DUE
DESIGN 	1	Measure total amount of Point of Sale (POS) materials used for the marketing of products. Also, ensure where possible materials that are both recycled and recyclable are used for POS and aim to place the recycle symbol on POS.	Ensure suppliers of POS provide us with material, quantity and weight for each consignment of POS delivered to Nintendo. Record this information on the Environmental Database. Ensure POS is printed on recycled material and investigate the possibility of placing the recycle symbol on POS items.	Trade Marketing Coordinator	January 2009 (+ Ongoing)
	2	Add all new items from Club Nintendo to recording and reporting process.	Make sure that all new products to be supplied to consumers as part of Club Nintendo have their weights and quantities recorded. Investigate recyclability of these items.	Business Affairs Assistant	January 2009 (+ Ongoing)
	3	Consult with Nintendo Co. Ltd on any changes to packaging materials.	Report on information received from Nintendo Co. Ltd regarding variations to specific materials.	Director of Business Affairs Artwork Planning Coordinator	As Required
	4	Ensure where possible materials that are both recycled and recyclable are used for locally produced art work.	Report on what has already been done in this area and further investigate the environmental position of local printer and consider switching suppliers if necessary.	Artwork Planning Coordinator	January – June 2009

CATEGORY		OBJECTIVE	COMPANY MEASURE	RESPONSIBILITY	DATE DUE
PRODUCTION 	1	Advise packaging manufacturer of our commitment to The Covenant and encourage minimizing waste in over-production runs (objective of maximum 0.5% disposal of over production packaging).	Refresh communication with our packaging manufacturers via letter, our commitment to The Covenant, and continue to work together on the accuracy of orders and production quantities.	Warehouse Manager Artwork Planning Coordinator	Annually June 2009 - 2011

CATEGORY		OBJECTIVE	COMPANY MEASURE	RESPONSIBILITY	DATE DUE
DISTRIBUTION	1	Identify areas of waste in the distribution process system and implement a reduction plan.	Report on non recyclable materials in our material range. Liaise where possible with other users of this material to share ideas and reduction plans.	Director of Operations	March 2009
	2	Decrease demand for reprints of printed material.	Publish certain manuals on our website or e mail this information to customers to eliminate reprints.	Artwork Planning Coordinator	June 2009

CATEGORY		OBJECTIVE	COMPANY MEASURE	RESPONSIBILITY	DATE DUE
DISPOSAL	1	Reduce waste collections and minimise cardboard going to recycling by reusing.	Uphold current systems in place, and continue to investigate new recycling projects to ensure packaging materials are not sent to landfill where recycling systems / re-use can be implemented.	Director of Operations	Ongoing
	2	Reduce the amount of plastic going to landfill.	Investigate a plastic recycling system for number code 5 Polypropylene (Game Cases & Strapping)	Director of Operations	June 2009

CATEGORY		OBJECTIVE	COMPANY MEASURE	RESPONSIBILITY	DATE DUE
MARKET DEVELOPMENT	1	Contribute to the National Packaging Covenant funding arrangements to address a broad range of programs including away from home recycling and enhancing recycling infrastructure.	Make annual contribution and communicate the use of funding to senior management.	Director of Business Affairs	Annually
	2	Investigate best practice for recycling and waste reduction in our industry and overseas.	Utilise local and international meetings as an opportunity to share local and global environmental issues. Share ideas and current implementations that may not already exist within our business and report on outcomes.	Director of Business Affairs	Annually

CATEGORY		OBJECTIVE	COMPANY MEASURE	RESPONSIBILITY	DATE DUE
EDUCATION	1	Continue to raise awareness of our commitment to the National Packaging Covenant and other environmental initiatives by; presentations at quarterly staff meetings, quarterly Environmental Committee bulletins on recycling etc	<p>In the quarterly meetings on 31 October 2008 and 30 January 2009 all staff were reminded of the importance of recycling and the colour coded recycling system was reaffirmed.</p> <p>An initiative to replace halogen down lights with more energy efficient compact fluorescent alternatives will be reported to all staff before implementation.</p> <p>It is hoped that awareness of recycling initiatives that are outside of the core objectives of the National Packaging Covenant will have a flow-on effect to help encourage all staff to better contribute to meeting NPC objectives.</p>	<p>Planning Analyst</p> <p>Catering Officer (formerly Facilities Officer)</p>	Quarterly 2009- 2011
	2	Education program for retailers including a letter of our commitment to the National Packaging Covenant.	Revise previous letter sent, update contact names, and recognise current signatories to the National Packaging Covenant to encourage non signatories to do so.	<p>Director of Business Affairs</p> <p>Director of Operations</p>	June 2009
	3	Improve on the current training provided to the warehouse staff.	Training on recycling and the correct disposal of materials will be given on commencement and every 3 months thereafter. A sign off sheet will be created for staff to sign once training has been completed.	Warehouse Manager	November 2008 (+ Ongoing)

CATEGORY		OBJECTIVE	COMPANY MEASURE	RESPONSIBILITY	DATE DUE
LABELLING	1	Investigate recycling symbols and ways of including recycling symbols on to product packaging.	Research recycling symbols and their use in Australia. Communicate with Nintendo Co. Ltd in order to get symbols placed on packaging.	Artwork Planning Coordinator	January 2009

CATEGORY		OBJECTIVE	COMPANY MEASURE	RESPONSIBILITY	DATE DUE
WHOLESALE AND RETAILING	1	Communicate with Retailers (letter) on the correct method of disposal for POS material.	Send letter to Retailers advising them of our commitment and expectations and guidelines regarding correct disposal of POS material. In this letter also list signatories to the NPC. Report any outcomes gained from promoting this information.	Trade Marketing Coordinator	March 2009 - 2011
	2	Use our Field Representatives to ensure POS is disposed of in the correct way by retailers.	Educate our Field Representatives on the correct way to dispose of used POS in order for them to monitor and encourage this at the retail level.	Trade Marketing Coordinator	March 2009

*Note: field merchandiser team has been replaced with Field Representatives

CATEGORY		OBJECTIVE	COMPANY MEASURE	RESPONSIBILITY	DATE DUE
RECYCLING AND REPROCESSING	1	Refer to KPI's Wholesaling and Retailing, Education, Distribution and Labelling.			

CATEGORY		OBJECTIVE	COMPANY MEASURE	RESPONSIBILITY	DATE DUE
REPORTING	1	Nintendo Australia will attend Nintendo's Global Compliance Committee (GCC) meeting and report on the progress of their Action Plan and commitment under the National Packaging Covenant.	<p>In November 2008 Nintendo Australia's Business Affairs Director provided a written report to Nintendo's GCC committee on:</p> <ol style="list-style-type: none"> 1. Covenant's recycling targets for 2010 2. Covenant's mandatory KPIs 3. Nintendo Australia's annual report 4. Nintendo Australia's Action Plan for 2009-2010 5. Information on the Covenant's use of funding and the independent review of the Covenant <p>In April 2009 under the subject of Corporate Social Responsibility the Business Affairs Director discussed Nintendo Australia's commitment to the Covenant.</p>	Director of Business Affairs	April, November Annually
	2	All information on the NPC and our initiatives will be reported to Nintendo Co. Ltd as part of the compilation of the annual Corporate Social Responsibility (CSR) Report.	Provide a thorough analysis of our work on packaging and goals in this area to Nintendo Co. Ltd for inclusion in the CSR report. Review this report annually.	Director of Business Affairs	July 2009, 2010, 2011

PRODUCT STEWARDSHIP AND INDIVIDUAL TARGETS: RESULTS

Design, Production, Distribution, Disposal, Research, Market Development, Education, Labelling, Wholesaling & Retailing, Recycling & Reprocessing, Reporting.

DESIGN

Action 1

Objective:

Measure total amount of Point of Sale (POS) materials used for the marketing of products. Also, ensure where possible materials that are both recycled and recyclable are used for POS and aim to place the recycle symbol on POS.

Reporting Measure:

Ensure suppliers of Point of Sale (POS) provide us with material, quantity and weight for each consignment of POS delivered to Nintendo. Record this information on the Environmental Database. Ensure POS is printed on recycled material and investigate the possibility of placing the recycle symbol on POS items.

Results:

Point of Sale used in the 2008-2009 financial year was measured and recorded. In total there was 59.9 tonnes of Point of Sale. The amounts of recyclable and non-recyclable POS are indicated in the table below in tonnes and as percentages of the total amount of POS used in the financial year.

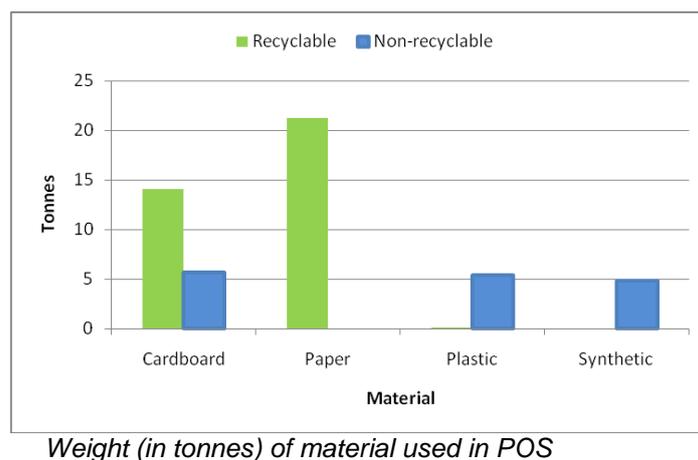
Point of Sale July 2008 – June 2009	
Recyclable	Non-Recyclable
42.59 tonnes (71.1% of total)	17.31 tonnes (28.9% of total)

Summary:

Nintendo Australia's suppliers of POS are required to record the amount of POS materials produced. Rather than record this information in Nintendo Australia's Environmental Database, a decision was made to keep this data separate from Nintendo Australia's database and instead have each supplier create and maintain their own records of POS delivered to Nintendo Australia. These records are being provided to Nintendo Australia after the end of each financial year.

The possibility of printing the recycling symbol directly on POS materials is being investigated.

Nintendo Australia has been in correspondence with its major suppliers of POS regarding material selection, and it is expected that the use of recyclable and recycled cardboard and paper will be increased prior to the end of 2009. Results show that currently 71.1% of the materials used to produce POS are recyclable. These figures establish baseline performance data that will provide comparison in future reports.



Action 2

Objective:

Add all new items from Club Nintendo to recording and reporting process.

Reporting Measure:

Make sure that all new products to be supplied to consumers as part of Club Nintendo have their weights and quantities recorded. Investigate recyclability of these items.

Results:

The weights and quantities of all new products to be supplied to consumers through the Club Nintendo program have been recorded in Nintendo Australia's Environmental Database.

Summary:

From July 2008 onwards, Club Nintendo premiums are being recorded and reported in the same manner as retail products.

Action 3

Objective:

Consult with Nintendo Co. Ltd on any changes to packaging materials.

Reporting Measure:

Report on information received from Nintendo Co. Ltd regarding variations to specific materials.

Results:

During the 12-month reporting period there have not been any significant changes in packaging materials to be described in this report. Changes have affected packaging configuration only, not the selection of materials. When any potential changes in packaging are being considered, Nintendo Co. Ltd. is in direct communication with Nintendo Australia to request that we research the impact that the new material will have on the environment and whether the material complies with Australian environmental laws.

Summary:

This Action is an ongoing requirement in order to meet the objectives of KPI 1, and to continue to comply with any relevant legal requirements.

Action 4**Objective:**

Ensure where possible materials that are both recycled and recyclable are used for locally produced art work.

Reporting Measure:

Report on what has already been done in this area and further investigate the environmental position of local printer and consider switching suppliers if necessary.

Results:

All new locally produced packaging materials during this reporting period have been recyclable. Further investigation of the environmental position of our primary provider of locally produced packaging has revealed that it has ISO14001 accreditation and it has implemented various measures to reduce energy consumption and reduce its impact upon the environment.

As the results show in KPI 1, during this reporting period we locally produced 8.76 tonnes of recyclable paper packaging.

Summary:

This objective contributes to the results of KPI 6. All locally produced product packaging is accompanied by a letter from the supplier declaring the quantity, weight, composition and whether the materials are recyclable.

As mentioned above, 8.76 tonnes of paper packaging was produced locally. This 8.76 tonnes consists of various forms of consumer information, for example, Instruction Manuals, Precaution Manuals and Covering Sleeves. These forms of consumer information are all produced on recyclable material.

PRODUCTION

Action 1

Objective:

Advise packaging manufacturer of our commitment to The Covenant and encourage minimizing waste in over-production runs (objective of maximum 0.5% disposal of over production packaging).

Reporting Measure:

Refresh communication with our packaging manufacturers via letter, our commitment to The Covenant, and continue to work together on the accuracy of orders and production quantities.

Results & Summary:

2509.23 tonnes of packaging was produced from July 2008 to June 2009, and 0.23 tonnes (230 kilograms) of over-produced packaging was recycled.

The abovementioned 0.23 tonnes of over-produced packaging included a small amount of over-produced packaging produced in Japan which was provided together with pre-packaged product and primarily intended as spares (e.g. to replace any packaging that may become damaged in transit or during handling).

We have found that there has been little need to reinforce our local packaging supplier's understanding of our commitment to The Covenant and the environment, as this understanding has become embedded in the way we conduct business with them. For example, each delivery of packaging from the local supplier is accompanied by a letter from the supplier stating the quantity, weight and composition of the materials and confirming that the materials are recyclable.

DISTRIBUTION

Action 1

Objective:

Identify areas of waste in the distribution process system and implement a reduction plan.

Reporting Measure:

Report on non recyclable materials in our material range. Liaise where possible with other users of this material to share ideas and reduction plans.

Results:

Non recyclable packaging materials have been reported under the heading of KPI 6 in this document. The percentage of non recyclable materials has been kept relatively low again at 0.05%.

Summary:

There is very little waste in the distribution process system but we continue to try to minimise waste through regular meetings of Nintendo Australia's Environmental Committee and the Operations Department.

Action 2

Objective:

Decrease demand for reprints of printed material.

Reporting Measure:

Publish certain manuals on our website or e mail this information to customers to eliminate reprints.

Results:

In total, 300 pages of instruction booklets have been made available online.

Summary:

A key selection of instruction booklets relating to Wii, Nintendo DS Lite and Nintendo DSi hardware and accessories have been published on the 'Support' section of Nintendo Australia's website. Consumers who contact Nintendo Australia to ask for reprints of instruction booklets can be directed to the Support page on the website instead of having printed booklets sent to them by mail. Additional support information Based on demand, more instruction booklets will be added on an ongoing basis.

DISPOSAL

Action 1

Objective:

Reduce waste collections and minimise cardboard going to recycling by reusing.

Reporting Measure:

Uphold current systems in place, and continue to investigate new recycling projects to ensure packaging materials are not sent to landfill where recycling systems / re-use can be implemented.

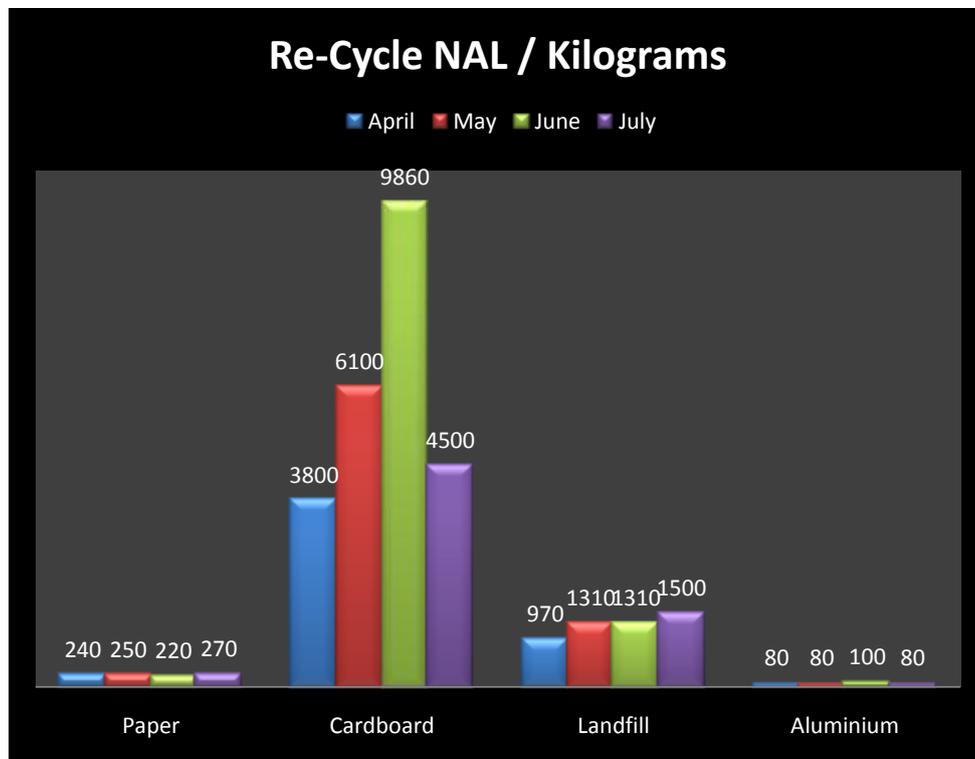
Results:

The Operations Department's monthly report that is distributed to all Directors and Managers includes a breakdown of what leaves the building from our collection facilities. This also now includes a comparison to the previous month. Please see below graph taken from the July Operations Monthly Report (figures are given in kilograms).

Summary:

Reporting these figures enables the Directors and Managers to engage in open discussion about our recycling collection facilities and waste going to landfill.

This reporting will be continued on a monthly basis.



Extract from Operations Monthly Report (July)

Action 2

Objective:

Reduce the amount of plastic going to landfill.

Reporting Measure:

Investigate a plastic recycling system for number code 5 Polypropylene (Game Cases & Strapping)

Results and Summary:

Investigations continue into possible arrangements for collection and recycling of code 5 Polypropylene plastics, which includes plastic Game Cases and strapping. Currently, plastic Game Cases that require disposal (e.g. because they become damaged in transit or during assembly) are sent to the same company that Nintendo Australia uses for recycling of e-waste.

Nintendo Australia has also gathered more information about the availability of recycling facilities for consumers to recycle Polypropylene Plastics such as Nintendo's Game Cases which have the recycling symbol and code 5 imprinted on the inside surface. As an example, the local waste disposal authorities at the location of Nintendo Australia's offices is able to accept code 5 plastics collected from household recycling bins.

MARKET DEVELOPMENT

Action 1

Objective:

Contribute to the National Packaging Covenant funding arrangements to address a broad range of programs including away from home recycling and enhancing recycling infrastructure.

Reporting Measure:

Make annual contribution and communicate the use of funding to senior management.

Results:

Nintendo Australia has committed to making an annual contribution to the National Packaging Covenant as per the contributions schedule.

Summary:

Nintendo Australia continues to make annual contributions as a commitment to the National Packaging Covenant to help the recovery and recycling of used packaging. The 2009 contribution has been made after informing the Covenant of our need to increase our contribution following a move up to the next turnover bracket.

Action 2

Objective:

Investigate best practice for recycling and waste reduction in our industry and overseas.

Reporting Measure:

Utilise local and international meetings as an opportunity to share local and global environmental issues. Share ideas and current implementations that may not already exist within our business and report on outcomes.

Results:

Corporate Social Responsibility is listed as an agenda item at each Nintendo Global Compliance meeting. Compliance to Environmental Laws are discussed on a global basis allowing us to gain insight in to the developments overseas and how these may be applied in Australia. Nintendo Co. Ltd., has regulations requiring standardization of designs that fully take into account the environmental effect of our products throughout their entire life cycles from the planning stage to disposal. Numerous measures are taken such as carefully selecting packaging materials with consideration for the environment (for example, avoiding the use of paper and aluminium foil composite material, which allows for as much recycling as possible).

Summary

Nintendo Australia continues to share ideas and current implementations that may not already exist within our business and report on outcomes.

We continue to raise, share and discuss ideas with our packaging to ensure it complies with Australian legislation.

Please refer to Actions 1 and 2 under the heading of 'REPORTING' in this document for specific details of information provided to Nintendo's Global Compliance Committee within this 12 month reporting period.

EDUCATION

Action 1

Objective:

Continue to raise awareness of our commitment to the National Packaging Covenant and other environmental initiatives by; presentations at quarterly staff meetings and quarterly Environmental Committee bulletins on recycling, etc.

Reporting Measure:

Record and report on current and new awareness activities. Regarding the colour coded bin system, conduct audits on bins and continue staff reminders on this topic.

Results:

During January, April, July and October we hold quarterly staff meetings which all permanent employees attend. The Environmental Committee nominates a spokesperson to speak at every meeting. Topics within the last financial year were as follows:

July 2008:

NPC

Colour-coded post-consumer waste recycling system

Switching off unused lights

October 2008:

NPC Report and NPC Action Plan for 2008-2011

Colour-coded post-consumer waste recycling system

Proposal to replace halogen downlights with energy efficient compact fluorescent lights

January 2009:

Colour-coded post-consumer waste recycling system

April 2009:

Emptying/rinsing of recyclables before putting into recycling bins

Reduction of electricity consumption

Summary:

Through presentations in quarterly meetings and email bulletins, staff are made more aware of the National Packaging Covenant and other environmental initiatives such as recycling of post-consumer waste material. The direct benefit in terms of our Covenant obligations is a high level of compliance by all staff, e.g. staff in the warehouse are more likely to dispose of cardboard packaging correctly instead of sending it landfill. This is further reinforced with regular training provided to Warehouse Team members including both permanent and casual staff as explained in Action 3 below.

Action 2

Objective:

Education program for retailers including a letter of our commitment to the National Packaging Covenant.

Reporting Measure:

Revise previous letter sent, update contact names, and recognise current signatories to the National Packaging Covenant to encourage non signatories to do so.

Results:

Please refer to results and summary for Action 1 for Production as this Action worked in conjunction with that KPI.

Summary:

A letter was sent out during the 2007 – 2008 report period with low response rate, however, seven of the top ten retailers of Nintendo products are now signatories to the National Packaging Covenant, two of them having joined during the 2008-2009 reporting period.

We will continue to persist with this KPI through continuous correspondence and make improvements in our follow up process to gain a higher response rate. We also aim to work more closely with our Field Representatives in this area.

Action 3

Objective:

Improve on the current training provided to the Warehouse Staff.

Reporting Measure:

Training on recycling and the correct disposal of materials will be given on commencement and every 3 months thereafter. A sign off sheet will be created for staff to sign once training has been completed.

Results:

The aforementioned training is consistently being conducted upon a staff member's commencement, and at 3 months intervals. Staff sign to confirm that they have completed the training.

Summary:

The aim of this training is to ensure that Warehouse Team members, the people responsible for putting recyclable waste into the correct containers, are fully compliant with the established processes to ensure positive results under KPIs 21 and 6.

LABELLING

Action 1

Objective:

Investigate recycling symbols and ways of including recycling symbols on to product packaging.

Reporting Measure:

Research recycling symbols and their use in Australia. Communicate with Nintendo Co. Ltd in order to get symbols placed on packaging.



Results:

Information on the recycling symbol or 'Mobius Loop' (shown above) was researched and presented in Nintendo Australia's previous annual report, as this Action has continued from the previous Action Plan to the current plan for 2008-2011.

Summary:

The Plastic Coding System is used to identify the type of plastic used for game cases. Nintendo Australia will investigate further to determine whether the Mobius Loop could and should appear on the packaging of Nintendo products. Consideration will be given to the consumers' access to recycling facilities for polypropylene throughout Australia.

WHOLESALE AND RETAILING

Action 1

Objective:

Communicate with Retailers (letter) on the correct method of disposal for Point of Sale (POS) material.

Reporting Measure:

Send letter to Retailers advising them of our commitment and expectations and guidelines regarding correct disposal of POS material. In this letter, also list signatories to the NPC. Report any outcomes gained from promoting this information.

Results:

This Action is in conjunction with Action 1 under Design and Action 2 under Education. As we continue to identify what POS is and is not produced on recycled material, and what POS is recyclable, we will then communicate the correct way to dispose of POS to our Retailers and Field Representatives.

Summary:

Two factors that will affect this Action in the future are:

1. The structure of Nintendo Australia's Field Representative team has changed significantly. Communication with retailers can be more direct and targeted to specific concerns.
2. There are plans to increasingly use recycled material from the end of 2009 onwards and this will affect the information that we will need to provide to retailers.

Action 2

Objective:

Use our Field Representatives to ensure POS is disposed of in the correct way by Retailers.

Reporting Measure:

Educate our Field Representatives on the correct way to dispose of used POS in order for them to monitor and encourage this at the Retail level.

Results and Summary:

During this reporting period the entire structure of Nintendo Australia's merchandising force has changed. While this has prevented any great deal of progress with regards to improving the disposal of POS materials, it affords greater control over what happens to POS materials throughout Australia. Further work will be done in this area now that new staff are onboard.

RECYCLING AND REPROCESSING

**Please note. This category has been covered in KPIs under Wholesaling and Retailing, Education, Distribution and Labelling.*

REPORTING

Action 1

Objective:

Nintendo Australia will attend Nintendo's Global Compliance Committee (GCC) meeting and report on the progress of their Action Plan and commitment under the National Packaging Covenant.

Reporting Measure:

Attend the GCC meeting and report on the progress of our Action Plan and commitment to the National Packaging Covenant. Gain ideas from counterparts on the GCC and report to Environmental Committee.

Results:

Nintendo Australia participated in the Global Compliance meeting in April 2009. Our representative, the Director of Business Affairs (who is also an Environmental Committee member) discussed the objectives of the National Packaging Covenant, our three year Action Plan, the reporting process and the development and progress of our KPIs within the Action Plan.

Summary:

The Nintendo Group recognises the importance to raise issues and discuss the impact our packaging has on the environment at each Global Compliance meeting which occur April and November of each year. Environmental issues continue to be an agenda item at each Global Compliance meeting.

Nintendo Australia continues to share our developments and update all affiliates at each Global Compliance meeting.

Action 2

Objective:

All information on the NPC and our initiatives will be reported to Nintendo Co. Ltd as part of the compilation of the annual Corporate Social Responsibility (CSR) Report.

Reporting Measure:

Provide a thorough analysis of our work on packaging and goals in this area to Nintendo Co. Ltd for inclusion in the CSR report. Review this report annually.

Results and Summary:

A thorough analysis of Nintendo Australia's work on packaging and related goals was presented to Nintendo Co., Ltd. In particular, Nintendo Co., Ltd. chose to highlight in the global CSR report the ratio of product to packaging and the percentage of packaging that is recyclable.

SIGNATORY COMMITMENT

The National Packaging Covenant Report on Action Plan for period 2008-2011 is signed on behalf of:

Organisation: *Nintendo Australia Pty Limited*

Address: *804 Stud Road, Scoresby, Victoria 3179*

By

Signature:

Neil O'Sullivan

Name:

Director of Finance

Position:

30/10/2009

Date:

Brand names covered by the Organisation: *Nintendo, Nintendo DS, Nintendo DS Lite, Nintendo DSi, Nintendo Wii*

Covenant Contact Officer

Kelvin Burns

Name:

804 Stud Road, Scoresby, Victoria 3179

Address:

Director of Business Affairs

Position:

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