



**WS Packaging Group, Inc.**

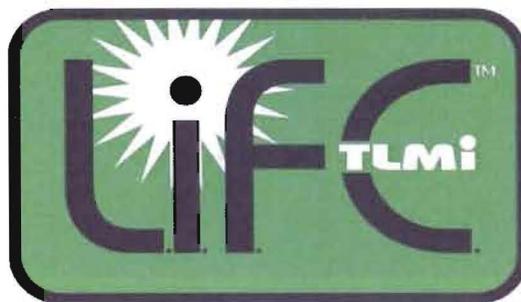
Leaders in Printing and Packaging Worldwide

# Attachment #3

Functional Equivalence  
To ISO 14001 Standards

# TLMI's

Label Initiative For The Environment



These are the L.I.F.E. Scorecard Instructions



Revised: November 23, 2009



**Project L.I.F.E.  
Label Initiative for the Environment**

**Scorecard Instructions**

- 1) Enter the name of your company and the specific manufacturing facility being scored, the date the scorecard was completed, and the name of the individual who completed the scorecard.
- 2) Place a 'Y' in the column that best captures the level of engagement in the activity listed in each row.

The criteria for evaluating your current involvement and the corresponding Score are listed below.

Column	Score
<b>Not Applicable:</b> This activity is not applicable to this facility.	NA
<b>No Activity:</b> We have not engaged in this activity at this facility.	No Activity
<b>Investigating:</b> We are currently investigating the development of a project or program at this facility.	Acceptable
<b>Engaged:</b> We have established formal engagement in this activity, either by undertaking a particular project, or developing formal programs. We have established a list of oportunities, goals and control and measurement systems.	Good
<b>Public reporting:</b> We have publicly reported our performance, program, and targets. Public reporting includes printed materials or a website.	Better
<b>Improvement from previous year:</b> In addition to publicly reporting our performance, we have met our annual improvement target.	Best
<b>Performance Measurement:</b> This column captures our performance in this category for the reporting year.	Not captured in Score

- 3) A rating for this level of performance (e.g., No Activity, Acceptable, Good, Better, Best) will automatically update in the 'Score' column.
- 4) Enter the amount of any performance improvement in this requirement in the previous year, using the unit of measurement listed. This is not included in your score.
- 5) Enter any comments or detail on your score in each activity in the column marked 'Comments'.  
**Please note that supporting documentation must still be submitted for certain levels.**
- 6) Instructions for how to become certified are available in L.I.F.E. Instructions.docx

Company Name	WS Packaging Group, Inc. - Algoma - Jefferson St.	Date Completed	10/1/2010
Enter Facility Identification (eg Address or Name)	1102 Jefferson St., Algoma, WI 54201	Completed By	Terry Moede

	Not Applicable	No Activity	Investigating	Engaged	Public Reporting	Improvement from Previous Year			
<b>1.0 Clean Production Techniques</b>	This requirement is not applicable to my facility	No activity has been conducted.	This activity is being investigated at the facility.	The facility is actively engaged in this activity.	The details of the formal program, metrics, and targets are publicly available	Facility has demonstrated improvement from previous year	Score	Environmental Management	Comments
<b>1.1 Releases to Air</b>	Enter NA	Enter Y or leave blank	Enter Y or leave blank	Enter Y or leave blank	Enter Y or leave blank	Enter Y or leave blank			
1.1.1 Program to decrease facility VOC, HAP and UV releases to air					Y		Better	Reduced by 8 ton from 2008 to 2009.	
1.1.2 Program to use best management practices to avoid other releases to air				Y			Good	Reduced amount of nitrogen purchased by 126,477 lbs. in 2009.	
<b>1.2 Releases to Water</b>									
1.2.1 Program to decrease quantity of facility releases of water				Y			Good	Preventive maintenance Program in place on all faucets.	
1.2.2 Program to minimize releases into waste water				Y			Good	Program in place to test all water before releasing into the public drinking system.	
<b>1.3 Waste</b>									
1.3.1 Program to minimize solid waste sent to landfill from production				Y			Good	Reduced amount of landfill waste from 10% in 2008 to 3% in 2009.	
1.3.2 Program to minimize solid waste sent to landfill from office and facility				Y			Good	30 tons of OCC & 36 tons of office paper recycled in 2009.	
1.3.3 Program to ensure proper disposal of hazardous waste					Y		Better	Increased from 3169 lbs. of Haz Waste in 2008 to 6422 lbs. in 2009.	
1.3.4 Program to recycle or encourage recycling of liner material from customers				Y			Good	We have partnered with a recycling company to offer pick up of liner from our customers and send it in for recycling.	
<b>1.4 Office and Facility</b>									
1.4.1 Policy and programs for using environmentally preferable cleaning practices in facility and office			Y				Acceptable	Increased to 11% of cleaning products that are environmentally preferable.	
1.4.2 Policy and program to give purchasing preference to environmentally preferable materials such as office supplies, paper, equipment, etc.			Y				Acceptable	Presently using remanufactured toner for all copier machines. Investigating recycled paper on all copy machines.	
1.4.3 Program to increase use of environmentally preferable packaging materials or practices for shipping				Y			Good	Patented product construction of extended text labels has eliminated the need for a carton.	
<b>1.5 Compliance Violations</b>									
1.5.1 Program to eliminate compliance fines, violations, and complaints				Y			Good	Zero fines or violations for 2009.	

CERTIFICATION NOTE: In order to apply for certification, the facility must demonstrate that no significant violations, fines, or complaints were incurred in the previous year. In addition the facility must score "Engaged" or better for at least 10 requirements of Sections 1, 2 and 3, and score "Engaged" in all of Section 4 for Management.

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	Not Applicable	No Activity	Investigating	Engaged	Public Reporting	Improvement from Previous Year	Score	Performance Measurement	Comments
<b>2.0 Energy and Greenhouse Gases</b>	This requirement is not applicable to my facility	No activity has been conducted.	This activity is being investigated at the facility.	The facility is actively engaged in this activity.	The details of the formal program, metrics, and targets are available to the public.	Facility has demonstrated improvement from previous year.			
<b>2.1 Energy Use</b>	Enter NA	Enter Y or leave blank	Enter Y or leave blank	Enter Y or leave blank	Enter Y or leave blank	Enter Y or leave blank			
2.1.1 Program to increase energy efficiency of production, offices and facilities				Y			Good	Energy efficient lights installed. LED EXIT lights installed. Motion sensors installed in offices.	
2.1.2 Program to increase energy efficiency of distribution fleet		Y					No Activity	No activity at this time.	
<b>2.2 Greenhouse Gases</b>									
2.2.1 Program for greenhouse gas management		Y					No Activity	No activity	
2.2.2 Program to increase use of renewable energy			Y				Acceptable	Investigating purchases of blocks of renewable energy.	
2.2.3 Program to offset greenhouse gas emissions		Y					No Activity	No measurement at this time.	

<b>Company Name</b>	WS Packaging Group, Inc. - Algoma - Jefferson St.	<b>Date Completed</b>	10/1/2010
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	Not Applicable	No Activity	Investigating	Engaged	Public Reporting	Improvement from Previous Year	Score	Performance Measurement	Comments
<b>3.0 Product Design</b>	This requirement is not applicable to my facility	No activity has been conducted.	This activity is being investigated at the facility.	The facility is actively engaged in this activity.	The details of the formal program, metrics, and targets are publicly available	Facility has demonstrated improvement from previous year			
<b>3.1 Integration of Environmental Performance into design</b>	Enter NA	Enter Y or leave blank	Enter Y or leave blank	Enter Y or leave blank	Enter Y or leave blank	Enter Y or leave blank		Enter amount and unit of measurement	
3.1.1 Program to design output and process to minimize waste in production and application				Y			Good	Roll Waste Stock was reduced to 12.6 % in 2009	
3.1.2 Program to work with customer to design graphics to minimize processing and material and energy use				Y			Good	Programs in place to reduce material waste with size adjustments. Test program started to recycle flexo plates.	
<b>3.2 Environmentally Preferable Materials</b>									
3.2.1 Program to use environmentally preferable facestock and tagstock materials			Y				Acceptable	We offer environmentally preferable facestock to our customers	
3.2.2 Program to use environmentally preferable adhesives and fasteners			Y				Acceptable	We offer environmentally preferable adhesives to our customers	
3.2.3 Program to use environmentally preferable liner material				Y			Good	Several customers have switched to PET liner.	

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	Not Applicable	No Activity	Investigating	Engaged (Prereq for Certification)	Public Reporting	Improvement from Previous Year	Score	Performance Measurement	Comments
<b>4.0 Management Practices</b>	This requirement is not applicable to my facility	No activity has been conducted	This activity is being investigated at the facility	The facility is actively engaged in this activity.	The details of the formal program, metrics, and targets are publicly available	Facility has demonstrated improvement from previous year			
<b>4.1 Overall management of business operations</b>	Enter NA	Enter Y or leave blank	Enter Y or leave blank	Enter Y or leave blank	Enter Y or leave blank	Enter Y or leave blank			
4.1.1 Policy that outlines Environmental Commitment				Y			Good	Environmental Policy in place	
4.1.2 Policy to review environmental risks				Y			Good	Developed an Environmental Aspects Identification form to identify our risks.	
4.1.3 Programs to monitor performance				Y			Good	Quarterly Environmental Inspection checklist completed and submitted to Corporate	
4.1.4 Policy to set annual continual improvement objectives and targets				Y			Good	WSPG Sustainability Scorecard completed annually.	
4.1.5 Program to develop Environmental Best Practices Awareness				Y			Good	Conducted an employee involvement program in 2009 with Green Month contest and newsletters.	
4.1.6 Programs outlining Emergency Response procedures				Y			Good	Spill Response Team in place. Crisis Management & Emergency Action Plan in place.	
4.1.7 Program to ensure corrective and preventative action management				Y			Good	Corrective Action Plan using the Environmental Non-compliance Investigation Form.	
4.1.8 Program to ensure regular performance review				Y			Good	Internal Audit procedures in place.	
4.1.9 Program to ensure proper maintenance of equipment				Y			Good	Annual Maintenance Program is in place.	

**Certification Note:** In order to apply for certification, all of the above requirements must meet at least the 'Engaged' level and at least 10 requirements from other sections.



<b>Sustainability Policies &amp; Procedures</b>		
<b>1.0 Clean Production Techniques</b>		
<b>1.1 Releases to Air</b>	<b>Performance Measurement</b>	<b>References for obtaining measurements</b>
<p><b>1.1.1 Program to decrease facility VOC, HAP, and UV releases to air</b></p> <ul style="list-style-type: none"> <li>➤ Many solvent-based inks have been replaced by water-based inks and UV inks.</li> <li>➤ Total VOCs emitted has been reduced by over 68% over the past nine years.*</li> <li>➤ Digital platemaking technology has eliminated film processing materials, chemicals, and solvents.</li> <li>➤ Our employees are trained in our Hazard Communications program to ensure all chemicals containers are labeled.</li> </ul>	<p>VOCs emitted were 30.2 ton in 2002. Our VOC emissions have been reduced by 68%. VOCs emitted in 2009 were 9.7 ton.</p> <p>Our goal is to reduce it by 5% in 2010.</p>	<p>Annual Air Emissions Inventory Summary Report</p> <p>Terry Moede</p> <p>Calendar Year</p>
<p><b>1.1.2 Program to use best management practices to avoid other releases to air</b></p> <ul style="list-style-type: none"> <li>➤ All exhaust stacks are at 25 feet above the ground.</li> <li>➤ All used solvent or shop towels are stored in a closed metal container and sent out weekly for laundering</li> <li>➤ It is company policy that all solvent parts cleaners' covers are closed when not in use.</li> <li>➤ All screw-in drum top funnels must keep lids closed when not adding waste.</li> <li>➤ Investment was made for a new more efficient nitrogen tank that has greatly reduced the amount of nitrogen being released into the atmosphere during high-pressure situations.</li> <li>➤ The majority of our inks and varnishes have zero HAPs. All other inks and varnishes have very minimal HAPs.</li> </ul>	<p>Nitrogen purchased in 2008 was 225,902 lbs.</p> <p>Nitrogen purchased in 2009 was 99,425 lbs.</p> <p>Our nitrogen purchased was reduced by 56%.</p> <p>Our goal is to reduce it by 5% in 2010.</p>	<p>Annual Air Emissions Inventory Summary Report</p> <p>Terry Moede</p> <p>Calendar Year</p>

<p><b>1.2 Releases to Water</b></p>		
<p><b>1.2.1 Program to decrease quantity of facility releases of water</b></p> <ul style="list-style-type: none"> <li>➤ Preventive Maintenance Program on all faucets</li> <li>➤ With the switch to our digital platemaking technology, we no longer need a still for reclaiming solvents. The still required non-contact cooling water that had been disposed of into the city sewer system.</li> </ul>	<p>Water usage for: 2008 = 1,267,900 gal. 2009 = 1,293,600 gal.</p> <p>Our goal is to reduce our usage in 2010 by 3%.</p>	<p>Request from Algoma Utilities</p>
<p><b>1.2.2 Program to minimize releases into waste water</b></p> <ul style="list-style-type: none"> <li>➤ All of our water-based waste inks and rinse go through a waste water treatment device. All hazardous parts of the waste are removed and fully encapsulated before being sent to the landfill. Remaining water is clear and sent to the city sewer system. <ul style="list-style-type: none"> <li>○ Each batch of pretreated wastewater is tested and logged before released into the city sewer.*</li> </ul> </li> </ul>	<p>9,500 gallons of water are treated per week</p> <p>Our goal is to have 100% of all releases into the city sewer system free from any hazardous substances.</p>	
<p><b>1.3 Waste</b></p>		
<p><b>1.3.1 Program to minimize solid waste sent to landfill from production</b></p> <ul style="list-style-type: none"> <li>➤ 40% of our previous landfill waste is now sent to a facility to convert the waste into fuel pellets.</li> <li>➤ It is our goal to increase the waste percent no longer sent to the landfill to 50%</li> <li>➤ All corrugated materials are sent in to be recycled.</li> <li>➤ The following items are sent in to recyclers: aluminum, copper, steel, monitors, computers, fluorescent bulbs, plastic bottles, cell phones, and batteries.</li> </ul>	<p>3,363 tons of waste hauled to the landfill in 2007 &amp; zero tons recycled. 3,169 tons hauled to the landfill in 2008 &amp; 321 tons recycled. (10%) 2,081 tons of waste hauled to the landfill in 2009 &amp; 1,289 tons recycled. (38%) Our goal is to increase recycled waste to 50% in 2010.</p>	<p>Garbage /Recycling Report</p> <p>Terry Moede</p> <p>Gary Denil Maintenance other recycling</p>
<p><b>1.3.2 Program to minimize solid waste sent to landfill from office and facility</b></p> <ul style="list-style-type: none"> <li>➤ Each person in the office has a waste basket as well as a blue "recycle" basket.</li> </ul>	<p>30 tons of occ (old corrugated cartons) and 36 tons of mixed office paper were recycled in 2009.</p>	<p>Obtain from Blue Waters</p>

<ul style="list-style-type: none"> <li>➤ Mixed scrap office paper is shipped separately to be recycled.</li> <li>➤ Office employees are encouraged to print on both sides of paper.</li> <li>➤ Common documents are stored on SharePoint intranet site instead of printing documents for each person's file.</li> </ul>	<p>Our goal is to increase both of those quantities by 5% in 2010.</p>	
<p><b>1.3.3 Program to ensure proper disposal of hazardous waste</b></p> <ul style="list-style-type: none"> <li>➤ We have a Hazardous Waste Program in place. <ul style="list-style-type: none"> <li>○ Our "Hazardous Waste Program" describes policies and procedures to meet WI DNR compliance for hazardous waste.</li> <li>○ Procedures are in place for the proper handling of hazardous waste.</li> <li>○ Documentation of all hazardous waste shipments are kept on file.</li> <li>○ All aerosol cans are punctured, emptied, and recycled.</li> <li>○ 6,422 lbs. of hazardous waste were shipped</li> </ul> </li> </ul>	<p>In 2009, we shipped out 6,422 lbs. of hazardous waste.</p> <p>Our goal is to reduce our hazardous waste in 2010 by 5%.</p>	<p>Annual Hazardous Waste Report</p> <p>Terry Moede</p>
<p><b>1.3.4 Program to recycle or encourage recycling of liner material from customers</b></p> <ul style="list-style-type: none"> <li>➤ We have partnered with a recycling company that specializes in liner recycling. Based on their area of the U.S., customers are given the specifications for the program and referred to the closest recycling center for their liner disposal. The recycler company has release liner service centers located in nine different cities throughout the United States to make it easier and more convenient for customers to recycle their liner.</li> </ul>	<p>In 2009, we had no customers that partnered with us on a liner recycling program.</p> <p>Our goal is to have at least two customers in 2010.</p>	<p>Obtain information from Mary Hyde (Marketing Dept.)</p>
<p><b>1.4 Office and Facility</b></p>		
<p><b>1.4.1 Policy and programs for using environmentally preferable cleaning practices in facility and office</b></p> <ul style="list-style-type: none"> <li>➤ Approximately 11% of our cleaning supplies are non-toxic, biodegradable, non-hazardous, non-flammable, and non-corrosive. We propose to increase that to 22%.</li> <li>➤ Cleaning products with no or low VOCs are used wherever possible.</li> </ul>	<p>11% of cleaning products used are biodegradable, non-hazardous, non-flammable, and non-corrosive.</p> <p>Our goal is to replace more cleaning products with eco-friendly cleaners</p>	<p>Obtain information from Maintenance Dept. (Cleaning Personnel)</p>

<ul style="list-style-type: none"> <li>➤ Each custodial employee has been trained in Hazard Communications. They know and understand that they must read and follow product labels and use only the amount needed. Cleaning procedures are in place.</li> <li>➤ We have invested in an automated "Flexowash" plate cleaner, which has eliminated the process of cleaning plates by hand with alcohol and acetate.</li> <li>➤ We have invested in an automated "Flexowash" anilox roll cleaner, which uses a less corrosive chemical for cleaning and has reduced exposure to employees, who are cleaning rolls by hand.</li> <li>➤ As part of our waste reduction/energy reduction program, an air hand dryer has been installed in one of the bathrooms and the paper toweling dispenser removed. If this trial is successful, we would install air hand dryers in all bathrooms and eliminate usage of paper toweling.</li> <li>➤ All bathroom tissue and paper toweling purchased are composed of 100% recycled fiber.</li> </ul>	<p>and raise that % to 22%.</p>	
<p><b>1.4.2 Policy and program to give purchasing preference to environmentally preferable materials such as office supplies, paper, equipment, etc.</b></p> <ul style="list-style-type: none"> <li>➤ We use centralized purchasing/leasing for office equipment, consumable supplies, etc. <ul style="list-style-type: none"> <li>○ Mandates staged approval process for purchase</li> <li>○ Standardizes product lines</li> <li>○ Deploys (leased) copier products company wide</li> <li>○ Eliminates uninformed product purchase decisions</li> </ul> </li> <li>➤ All copier machines use remanufactured toner, which eliminates toner cartridges from going into the landfill.</li> </ul>	<p>No measurement at this time.</p>	<p>Purchasing Dept.</p>
<p><b>1.4.3 Program to increase use of environmentally preferable packaging materials or practices for shipping</b></p> <ul style="list-style-type: none"> <li>➤ Customer supplied boxes <ul style="list-style-type: none"> <li>○ Final product shipping boxes supplied by the customer are used for label order returns</li> </ul> </li> </ul>	<p>No measurement at this time.</p>	<p>Customer Service Dept.</p>

<ul style="list-style-type: none"> <li>○ One customer measured reusable box program resulting in seven tons of corrugated saved each year</li> <li>➤ Unique product-stacking configuration <ul style="list-style-type: none"> <li>○ Corrugated boxes(2MM) are eliminated entirely</li> <li>○ Product is placed directly on the shipping pallet</li> <li>○ Corner reinforcement and shrink film protection</li> </ul> </li> <li>➤ PATENTED PRODUCT CONSTRUCTION <ul style="list-style-type: none"> <li>○ Our MultiVision® product line of extended text labels provides additional label space through multi-layer extended text constructions</li> <li>○ Eliminates the use of cartons, folded instruction sheets, and associated costs, by having all the required consumer information right on the bottle or tube</li> <li>○ We produce linerless labels, eliminating the liner waste product and disposal expense</li> <li>○ We offer a product prototypes or “mock-ups” service for new sustainable packaging ideas, label designs, alternate materials, new constructions, and POP/POS for new product lines</li> </ul> </li> </ul>		Vision Team (Jake LeCloux)
<p><b>1.5 Compliance and Violations</b></p>		
<p><b>1.5.1 Program to eliminate compliance fines, violations, and complaints</b></p> <ul style="list-style-type: none"> <li>➤ Each WSPG facility completes a quarterly Corporate Environmental Compliance Checklist and submits it to the Corporate Environmental Director</li> <li>➤ Our facility deploys 6S principles. All employees have been trained and each production department must complete a daily 6S checklist.</li> <li>➤ Each WSPG facility completes a Quarterly Risk Management Score Card. Twenty-six different safety directives are listed, completed, and recorded on an annual basis.</li> <li>➤ Our facility is AIB compliant and must pass an annual audit to retain that status. The audit includes inspection of operational methods and personal practices, maintenance for product</li> </ul>	<p>Our facility had zero fines or violations in 2009.</p> <p>Our AIB audit score was 915 out of 1000 (Superior) in June 2010.</p> <p>Our goal is to get an AIB audit score of 920 or higher in 2011.</p>	<p>Corporate Environmental Director</p> <p>QA Manager</p>

<p>safety, cleaning practices, integrated pest management, and adequacy of production safety programs.</p>		
<p><b>2.0 Energy and Greenhouse Gases</b></p>		
<p><b>2.1 Energy Use</b></p>		
<p><b>2.1.1 Program to increase energy efficiency of production, offices and facilities</b></p> <ul style="list-style-type: none"> <li>➤ A facility energy team was established in January of 2010 to find ways to reduce energy usage and costs and eliminate waste.</li> <li>➤ Lighting motion sensors have been installed in all bathrooms, in the new remodeled customer service department, and in other various parts of the facility</li> <li>➤ An air leak study was completed in May, 2010.</li> <li>➤ In the last year, we made significant capital investment in technology that reduces energy waste during roll changes during shut-down and re-starting.</li> <li>➤ 50 % of all "EXIT" signage lights have been switched over to LED lighting.</li> <li>➤ We are investigating installation of LED "Egress" lighting outside of the building.</li> <li>➤ Three rooftop AC units were upgraded within the past year to more energy efficient models</li> <li>➤ We are looking at establishing office temperature guidelines/limits for each season.</li> <li>➤ All portable heaters have been removed from the customer service department.</li> </ul>	<p>50 % of all "EXIT" lights have been switched over to LED lighting.</p> <p>Our goal is to have 100% of all "EXIT" lights switched over to LED lighting.</p> <p>In 2009 our Gross Annual Sales/Annual Energy Usage in kWh = \$1.3826/kWh</p> <p>In 2010 our goal is decrease that number by 2%.</p>	<p>Maintenance Supervisor &amp; Environmental Director</p>
<p><b>2.1.2 Program to increase energy efficiency of distribution fleet</b></p>	<p>No measurement at this time.</p>	

<b>2.2 Greenhouse Gases</b>		
<b>2.2.1 Program for greenhouse gas management</b>	No measurement at this time.	
<b>2.2.2 Program to increase use of renewable energy</b> <ul style="list-style-type: none"> <li>➤ Investigating purchase of renewable energy through our utility company <ul style="list-style-type: none"> <li>○ We can purchase 100 blocks or more per month</li> <li>○ Cost: Industrial rate of \$2.00/300 kWh block</li> <li>○ Purchasing 307 blocks = 25% of consumption on one account (\$614.00)</li> </ul> </li> <li>➤ Meeting with contractors for potential installation/trial of wind turbines.</li> </ul>	In 2009 no renewable energy was purchased.  Our goal is to purchase 1% renewable energy in 2010.	Sustainability Committee
<b>2.2.3 Program to offset greenhouse gas emissions</b>	No measurement at this time.	
<b>3.0 Product Design</b>		
<b>3.1 Integration of Environmental Performance into Design</b>		
<b>3.1.1 Program to design output and process to minimize waste in production and application</b> <ul style="list-style-type: none"> <li>➤ We have formed a waste committee, focused on waste reduction plant wide.</li> <li>➤ We utilize lean manufacturing processes and tools, such as Kaizen events, to gather ideas/suggestions from all areas and functional line personnel for waste reduction solutions.</li> <li>➤ We have created a model and are actively focusing on material SKU consolidation. To date, we have eliminated 59 SKU's, reducing the likelihood of obsolescence and subsequent waste.</li> <li>➤ In the last year, we made significant capital investment in technology that reduces waste due to shutting down and starting back up with roll changes.</li> </ul>	In 2009 our Roll Waste Stock / Total Material Used was 12.6%  Our goal for 2010 is to reduce that waste to 12.5%  In 2009 our total \$\$ of R&A (Returns & Allowances) / Label Sales was .79%.  Our goal for 2010 is to reduce that	Lean Team  (Corie Zimmerman)

<ul style="list-style-type: none"> <li>➤ We are developing environmentally friendly coatings that may reduce the consumption of over-laminate films.</li> <li>➤ We have worked with major customers to create a recycling program for silicone liner.</li> <li>➤ We have major accounts that have eliminated the use of corrugated boxes in shipping, utilizing a skid pack design.</li> <li>➤ Order by the roll rather than the master (Exact, TIPS, precise, etc. - no off cuts)</li> <li>➤ Order only what is needed per job requirements within the allowable over/under run percentage (less chance of unassigned inventory)</li>   <li>➤ SKU rationalization: <ul style="list-style-type: none"> <li>○ Consolidate purchases to use tier one suppliers</li> <li>○ Consolidate SKU's</li> <li>○ Consolidate sizes within a SKU</li> <li>○ Move away from minimum buy materials</li> <li>○ Set target materials per category (i.e. WHG, SG, foil, etc.)</li> </ul> </li> <li>➤ Unassigned material inventory plan <ul style="list-style-type: none"> <li>○ Roll up</li> <li>○ Substitute</li> <li>○ Slit</li> <li>○ Use for make ready</li> <li>○ Sell <ul style="list-style-type: none"> <li>▪ Transfer to another WSPG facility</li> <li>▪ Roll exchange/ broker</li> </ul> </li> <li>○ Donate to local technical school</li> </ul> </li> <li>➤ Yearly review of job costing to verify actual vs. estimated waste and make-ready on repeat jobs.</li> <li>➤ No-stretch wrap program" on the pallets for direct material shipments received from suppliers.</li> </ul>	<p>rate to .50%.</p> <p>In 2009 our Average Initial Set up time was 53 minutes per set up.</p> <p>Our goal for 2010 is to reduce that set up time to 45 minutes.</p>	
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<p><b>3.1.2 Program to work with customer to design graphics to minimize processing and material and energy use</b></p> <ul style="list-style-type: none"> <li>➤ Expanded Gamut printing/ 6- and 7-color process: Ink stations set up with the same inks to reduce change overs and setup. More efficiency gained at press, less material used for setup and possibly fewer plates.</li> <li>➤ Plate Recycling: Our vendor has stated they would like to beta the collection of used flexo plates for a recycling program. We responded that we would like to be part of that test program.</li> <li>➤ Recommend a size adjustment (width) to reduce material waste and better fit the master roll width.</li> <li>➤ Recommend a size adjustment to utilize in-house tooling rather than purchase new.</li> <li>➤ Recommend a size adjustment (length) to utilize existing magnetic cylinder rather than purchase a new engraved die.</li> <li>➤ Recommend a size adjustment to run more across on press – running more efficiently and reducing run time on press.</li> <li>➤ Look at the possibility of digital production vs. flexographic to eliminate plate and art charges.</li> <li>➤ Offer our patented MultiVision® extended text labels with multiple-ply construction to eliminate extra packaging such as carton, instruction sheet, etc.</li> </ul>	<p>No measurement at this time.</p> <p>Case study on file for carton, etc. reduction example</p>	<p>Estimating Dept.</p>
<p><b>3.2 Environmentally Preferable Materials</b></p>		
<p><b>3.2.1 Program to use environmentally preferable facestock and tag stock materials</b></p> <ul style="list-style-type: none"> <li>➤ We offer our customers materials that create more sustainable packaging such as: <ul style="list-style-type: none"> <li>○ Recycled papers <ul style="list-style-type: none"> <li>▪ Composed of 10% to 100% post consumer waste.</li> </ul> </li> <li>○ Dissolvable papers <ul style="list-style-type: none"> <li>▪ Washes away with either cold or hot water</li> </ul> </li> </ul> </li> </ul>	<p>No measurement at this time.</p>	<p>Purchasing Dept.</p>

<ul style="list-style-type: none"> <li>○ Tree-Free papers made of fibers from fast growing plants such as: <ul style="list-style-type: none"> <li>▪ Sugar Cane</li> <li>▪ Bamboo</li> <li>▪ Hemp</li> <li>▪ Cotton Linters</li> </ul> </li> <li>○ Biodegradable films <ul style="list-style-type: none"> <li>▪ Made from regenerated cellulose</li> </ul> </li> <li>○ Bio-plastic films <ul style="list-style-type: none"> <li>▪ Made from renewable resources, rather than petroleum, including: <ul style="list-style-type: none"> <li>• Starch</li> <li>• Corn &gt; PLA film</li> <li>• Cellulose &gt; Acetate</li> </ul> </li> </ul> </li> </ul> <p>➤ We offer our customers paper that is FSC / SFI certified.</p>		
<p><b>3.2.2 Program to use environmentally preferable adhesives and fasteners</b></p> <ul style="list-style-type: none"> <li>➤ To facilitate the reuse of containers, we offer our customers a dissolvable adhesive that can be cleanly removed.</li> <li>➤ We offer our customers a recycle-compatible adhesive. <ul style="list-style-type: none"> <li>○ Allows paper fibers and adhesive to be separated in the recycling process. <ul style="list-style-type: none"> <li>▪ Permits envelopes, papers, catalogues, etc. containing PS labels to be recycled without contaminating the recycled product.</li> </ul> </li> </ul> <p>We offer our customers a water-based acrylic adhesive and solvent-free silicone.</p> <li>○ Minimizes hazardous waste and air emissions</li> </li></ul>	<p>No measurement at this time.</p>	<p>Purchasing Dept.</p>
<p><b>3.2.3 Program to use environmentally preferable liner material</b></p> <ul style="list-style-type: none"> <li>• Natural Kraft Liner <ul style="list-style-type: none"> <li>○ Performs the same as white liner.</li> <li>○ Does not require bleach, chlorine dioxide, or die.</li> <li>○ Can be recycled with other paper liners.</li> </ul> </li> <li>• PET Liners <ul style="list-style-type: none"> <li>○ Thinner than paper.</li> </ul> </li> </ul>	<p>No measurement at this time.</p>	<p>Purchasing Dept.</p>

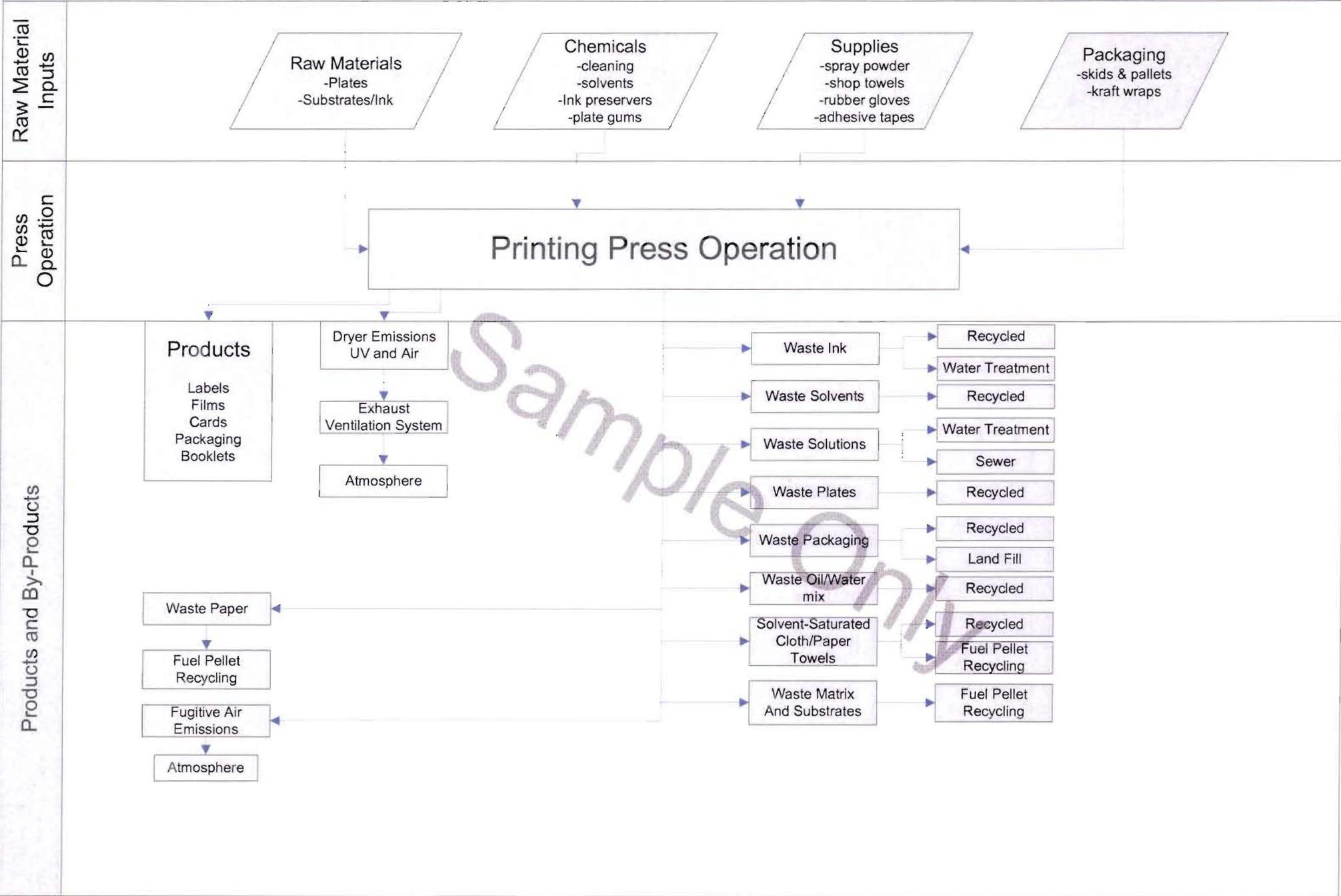
<ul style="list-style-type: none"> <li>○ Creates less waste.</li> </ul> <p>NOTE: Silicone-coated release liner, butt rolls, jumbo rolls, and obsolete stock can be recycled by companies such as Channeled Resources. They have 8 locations in the USA and 1 location in Canada. Please see more information at their website: <a href="http://www.channeledresources.com">http://www.channeledresources.com</a>.</p>		
<p><b>4.0 Management Practices</b></p>		
<p><b>4.1 Overall Management of Business Operations</b></p>		
<p><b>4.1.1 Policy that outlines Environmental Commitment</b></p> <ul style="list-style-type: none"> <li>➤ Our Environmental Policy is stated as follows: At WS Packaging Group, we operate our business as a corporate citizen committed to sound social, ethical, and environmental management, which includes protecting our environment, managing our energy use, and conserving natural resources. Our goals are to ensure that our company facilities and business operations comply with federal, state, and local laws and sustainable standards and to provide products that are environmentally sound throughout their lifecycles. We conduct our operations in an environmentally responsible manner and develop sustainable packaging improvements and solutions for our customers. We believe that an appropriate balance can and should be achieved between environmental goals and economic health and performance.</li> </ul>	<p>No measurement</p>	<p>Environmental Director</p>
<p><b>4.1.2 Policy to review environmental risks</b></p> <ul style="list-style-type: none"> <li>➤ Each Department has conducted an inspection of the waste, water discharge, air emissions, etc. using the "Environmental Aspects Identification Form".</li> <li>➤ All solvents are stored in an "Explosion Proof" room. This room has a floor drain that drains into a holding tank. The room is designed to prevent any spills from escaping into the environment.</li> </ul>	<p>No measurement at this time.</p>	<p>Environmental Director</p>

<ul style="list-style-type: none"> <li>➤ All Hazardous Waste barrels are stored with a containment unit underneath to prevent spills from getting into the environment or into a sewer drain.</li> </ul>		
<p><b>4.1.3 Programs to monitor performance</b></p> <ul style="list-style-type: none"> <li>➤ All usage of inks, coatings, and solvents are recorded electronically. Every bottle that goes to press has a bar code and is scanned. Reports are computed monthly and are documented to determine the amount of VOCs emitted for the month.</li> <li>➤ An annual Air Emissions Inventory Summary Report is submitted to the Wisconsin DNR.</li> <li>➤ A spreadsheet is kept on file and is updated daily to calculate the amount of material that is sent to the local landfill and to the local recycler to be converted to fuel pellets.</li> </ul>	<p>No measurement at this time.</p>	<p>Environmental Director</p> <p>Quarterly Environmental Checklist</p>
<p><b>4.1.4 Policy to set annual continual improvement objectives and targets</b></p> <ul style="list-style-type: none"> <li>➤ Corporately we have formal metrics for multiple key business objectives. We have set objectives for improvement, specifically for waste reduction and energy usage reduction</li> <li>➤ As a facility, we develop an annual formal Strategic Action Plan to address improvement efforts. We then meet quarterly with each department to review our progress in our strategic plan.</li> <li>➤ Each WSPG facility must complete a Sustainability Scorecard. The scorecard is designed to apply a score to 41 separate items that cover Clean Production Techniques, Energy Efficiency, Recycling, and Management Practices.</li> </ul>	<p>Our facility score on the WSPG Scorecard for 2009 was 92.</p> <p>Our goal is to score 95 or higher in 2010.</p>	<p>Environmental Director</p>
<p><b>4.1.5 Program to develop Environmental Best Practices Awareness</b></p> <ul style="list-style-type: none"> <li>➤ A corporate Sustainability Committee was established in 2008.</li> <li>➤ All new employees are trained in Safety and General Manufacturing Practices before they begin employment.</li> <li>➤ Each month our facility has a mandatory facility-wide meeting for all employees, educating and sharing progress and ideas.</li> </ul>	<p>No measurement at this time.</p>	<p>Environmental Director</p>

<p>Production, Quality, Lean, Safety, and Sustainability are standard topics of each month's presentation.</p> <ul style="list-style-type: none"> <li>➤ Employees have become involved through our Green Month Program which included: <ul style="list-style-type: none"> <li>○ Green Month News letters</li> <li>○ Green Month Contest with prizes</li> <li>○ Sharing and implementation of "Green Ideas" that were submitted by the employees</li> </ul> </li> <li>➤ Recycling programs are in place to recycle all eligible items and reduce waste volume sent to the landfill.</li> <li>➤ Each WSPG facility is required to complete an "Environmental Compliance Self-Assessment Guide". <ul style="list-style-type: none"> <li>○ Attachment: Environmental Self-Assessment Guide</li> </ul> </li> </ul>		
<p><b>4.1.6 Programs outlining Emergency Response procedures</b></p> <ul style="list-style-type: none"> <li>➤ A Spill Response Team is composed of employees that are trained annually. There are employees from each shift on the team.</li> <li>➤ Procedures are in place for employees to follow when dealing with hazardous waste.</li> <li>➤ There is an Emergency Response Team comprised of employees from all three shifts. Each member has been trained in first aid and in the use of the defibrillator.</li> <li>➤ WSPG has a "Business Continuity Plan Playbook" designed to ensure the survival of the company.</li> <li>➤ WSPG has a "Crisis Management and Emergency Action Plan" that outlines procedures in case of an emergency.</li> <li>➤ All new employees attend a New Employee Orientation and are educated on the emergency response procedures in this facility.</li> </ul>	<p>Our goal is to add environmental- and sustainability-related topics to the WSPG "Business Continuity Plan Playbook" in 2010.</p>	<p>Environmental Director</p>
<p><b>4.1.7 Program to ensure corrective and preventative action management</b></p> <ul style="list-style-type: none"> <li>➤ Our Safety Program's policy ensures we conduct an investigation for every accident and incident of "near miss". <ul style="list-style-type: none"> <li>○ An Accident Investigation Form is used to determine the "root cause" of an accident, and corrective actions are</li> </ul> </li> </ul>	<p>No measurement at this time.</p>	<p>Environmental Director</p>

<p>determined with a target date and a person accountable for completion.</p> <ul style="list-style-type: none"> <li>○ A “Supervisor’s Near Miss Report” is completed whenever an incident occurs and there are no injuries. The form is designed to determine the root cause of the incident and create an action plan to prevent reoccurrence.</li> <li>➤ Our Safety Committee performs monthly safety audits of departments. All non-compliance items are recorded in the Safety Meeting minutes, assigned to a person for correction, and given 30 days to correct.</li> <li>➤ Operating Procedures are in place to assign responsibilities for documenting non-conformities as reported by customers.</li> <li>➤ WSPG has a “Crisis Management and Emergency Action Plan” that outlines procedures in case of an emergency.</li> </ul>		
<p><b>4.1.8 Program to ensure regular performance review</b></p> <ul style="list-style-type: none"> <li>➤ An “Internal Audit Procedure “ is used to audit each of the environmental items on an annual basis.</li> </ul>	<p>No measurement at this time.</p>	<p>Environmental</p>
<p><b>4.1.9 Program to ensure proper maintenance of equipment</b></p> <ul style="list-style-type: none"> <li>➤ An annual Maintenance Program is in place for all presses.</li> <li>➤ We plan to install an annual Maintenance Program for all Rewinders.</li> <li>➤ A preventive Maintenance Program is in place for all printing presses.</li> <li>➤ There are several ‘External” Maintenance Programs in place for various high tech machines.</li> <li>➤ Inspection of all HVAC units is completed annually.</li> <li>➤ All press operators must attend and pass a Press Operator Certification class.</li> <li>➤ An audit for Air Leaks was performed in 2008 &amp; 2010.</li> <li>➤ A program is in place for preventive maintenance of all UV cassettes. The life of UV bulbs are tracked and monitored.</li> </ul>	<p>Our goal is to perform audits for Air Leaks at least annually.</p>	<p>Environmental Director</p>

<ul style="list-style-type: none"><li>➤ All scissors lifts are inspected annually by an outside contractor.</li><li>➤ All forklifts are inspected semi-annually by an outside contractor.</li><li>➤ The Quality Assurance Department calibrates the following instruments semi-annually: scales, rub tester, and digital calipers. The following instruments are calibrated annually: bar code scanner, micrometer, digital force gauges, and the pull tester.</li></ul>		
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**Environmental Aspects Identification**



Auditor: Terry Moede (Corp. Envir/Safety Director)  
 Audit Date: 10/05/2010

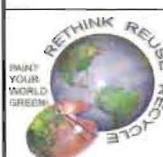
WSPG Facility: Algoma Label Plant (100)  
 Contracted? N/A

Process / Activity: Flexo-Printing  
 Process / Activity Location: Press Room

Raw Material Inputs				
Parts				
Paper Liner, Poly Films, Magnet stocks and Foils				
Chemical Material				
Water Based and UV Inks, Adhesives, Solvents, Varnishes, Additives and Cleaners				
Energy Use				
	Usage			
Type:	High	Medium	Low	
Electricity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Natural Gas	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Propane	N/A	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Steam	N/A	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Compressed Air	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Hydraulics	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other Input				
Nitrogen Gas				
Water Use				
	Usage			
Type:	High	Medium	Low	
Clean-Up	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Additive	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Provide a brief description of Process/Activity**  
 Manufacturing of Flexo Labels per customers needs.

Optional: Attach and circle photo, schematic, sketch drawing, detailed description.

Product Outputs	
Label Products, paper, poly films, magnet stock and foils	
	
Air Emissions (Include Noise/Odor)	
VOC's, some noise and some odor	
Waste By Products (Solid & Liquid) Check If Recycled	
Matrix	<input checked="" type="checkbox"/>
Paper	<input checked="" type="checkbox"/>
Poly Films	<input checked="" type="checkbox"/>
Cores-Corrugated	<input checked="" type="checkbox"/>
Core Plugs (Plastic)	<input checked="" type="checkbox"/>
Aluminum H-Clips	<input checked="" type="checkbox"/>
Skids/Pallets	<input checked="" type="checkbox"/>
Excess Inks:	
Water base	<input checked="" type="checkbox"/>
UV (Hazardous Waste)	<input checked="" type="checkbox"/>
Adhesives	<input checked="" type="checkbox"/>
Coatings/Varnishes	<input checked="" type="checkbox"/>
HP-Digital	<input checked="" type="checkbox"/>
Hazardous Waste (Oil Water)	<input checked="" type="checkbox"/>

Information Supplied By: Tim Feld (TRP)

Audit Participants: AJ Bonnell (Project Specialist)



Upon completion of this form, please scan the completed form in as a PDF and e-mail it to:

Terry Moede (TMoede@wspackaging.com)

Or, print out the form and FAX it to:

Terry Moede (920) 487-5644