



# Australian Government

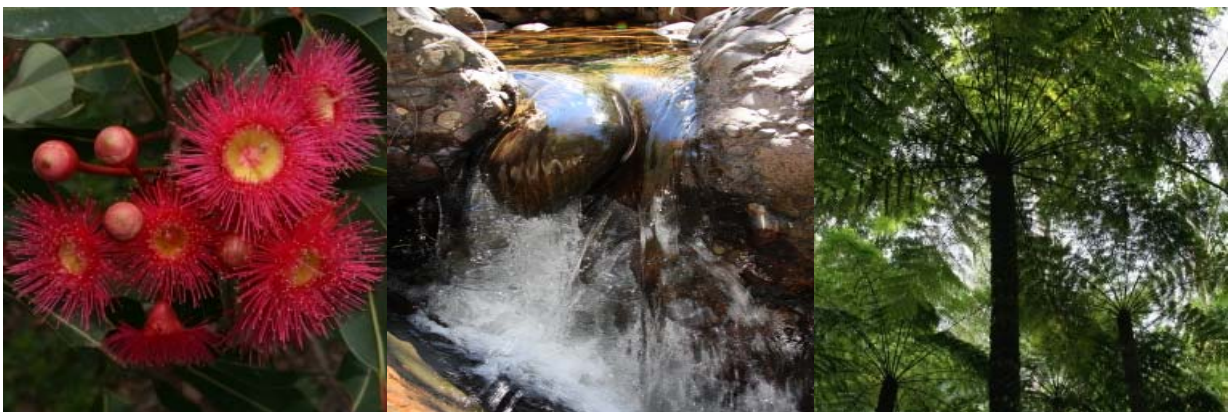
## National Packaging Covenant

### Draft Action Plan

July 2008 to June 2010

Prepared by

The Department of the Environment, Water,  
Heritage and the Arts



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## 1.0 Executive Summary

The Australian Government's National Packaging Covenant (the Covenant) Action Plan 2008–2010 has been approved by the Hon Peter Garrett AM MP, Minister for the Environment, Heritage and the Arts.

The Covenant is a voluntary initiative by Government and industry with the key objective being to reduce the environmental impacts of consumer packaging and office paper in Australia. Responsibility for delivery of the Covenant is shared between all sectors of the packaging supply chain, consumers, collectors, reprocessors and all levels of government.

As a signatory to the Covenant, the Australian Government is required to prepare an action plan outlining how the Covenant will be implemented in its business operations. This is the Australian Government's second action plan under the strengthened Covenant (Covenant Mark II). The action plan covers a two-year period from July 2008 to June 2010. It provides a commitment to continue implementing actions developed under the 2006–2008 action plan in addition to introducing new initiatives to improve packaging waste management across Australian Government operations.

The Australian Government is committed to exploring further opportunities to improve sustainability and reduce impacts on the environment as a whole, including packaging.

This action plan provides details of the Australian Government's activities that will contribute to the objectives and overarching targets set out in the Covenant. It may be amended at any time to reflect emerging priorities and initiatives. The Australian Government will incorporate the principles of the Covenant in its operations through:

- minimising the use of packaging and paper and using products that can be recovered
- implementing recovery systems for used packaging material and paper to maximise recovery, including in public places, and
- purchasing of products that incorporate recovered materials.

The Department of the Environment, Water, Heritage and the Arts is the agency responsible for managing the implementation of this action plan and preparing an annual report to the National Packaging Covenant Council. Further details on many of the activities outlined in this action plan can be found on the department's website: [www.environment.gov.au](http://www.environment.gov.au).

## 2.0 About the Australian Government

The Australian Government employs approximately 155,000 people and undertakes a wide range of activities throughout Australia, including:

- government administration
- management of public buildings
- management of defence facilities, and
- management of specialised sites such as the Antarctic bases.

The Australian Government has an annual purchasing budget of approximately \$17 billion.

Australian Government departments, statutory authorities, ministerial councils and other Government bodies are contained within the following portfolio groupings:

- Agriculture, Fisheries and Forestry
- Attorney-General
- Broadband, Communications and the Digital Economy
- Climate Change
- Defence
- Education, Employment and Workplace Relations
- Environment, Water, Heritage and the Arts
- Families, Housing, Community Services and Indigenous Affairs
- Finance and Deregulation
- Foreign Affairs and Trade
- Health and Ageing
- Human Services
- Immigration and Citizenship
- Infrastructure, Transport, Regional Development and Local Government
- Innovation, Industry, Science and Research
- Prime Minister and Cabinet
- Resources, Energy and Tourism
- Treasury
- Veterans Affairs

## **2.1 Role in the Packaging Supply Chain**

The primary role of the Australian Government in the packaging chain is as a consumer of packaging products.

The scale of the Australian Government's activities, particularly its expenditure in goods and services, places it in a strong position to stimulate the more sustainable use of resources throughout the economy. Where appropriate and justified, an increased demand for products with recycled content will increase markets for recovered material and stimulate market and business innovation to decrease the use of virgin materials in production.

With appropriate environmental management systems, procurement and waste management policies in place, the Australian Government can make a significant contribution to developing a sustainable culture in Australia and achieving a more effective use of resources. Making government operations sustainable is a gradual and incremental process.

The Australian Government will seek to continue its partnership with state, territory, local government and industry signatories in cooperative programs that support the achievement of Covenant goals and targets.

## 3.0 Covenant Commitments

The Australian Government is an original signatory to, and actively participates in, the continued development and implementation of the Covenant. In addition, the Australian Government contributes funds towards administering the Covenant Secretariat.

The Australian Government fully supports the Covenant principles of shared responsibility and lifecycle management of packaging and paper. It endorses the co-regulatory approach of the Covenant, which encourages organisations to share responsibility for packaging over its lifecycle from design to disposal to minimise environmental impact, reduce unnecessary use of resources and provide for disposal of packaging through re-use or recycling rather than landfill. The Australian Government signed the strengthened Covenant in November 2005.

The Australian Government, led by the Department of the Environment, Water, Heritage and the Arts, will implement and continue to maintain a number of actions and projects to support the Covenant's principles and overarching targets. These will be reported in the Australian Government's annual report to the National Packaging Covenant Council, together with data against the relevant key performance indicators outlined in Table 1.

### 3.1 Progress Since Last Action Plan

Under the previous action plan the Australian Government implemented the following initiatives:

- The Australian Government developed the Sustainability in Government website ([www.sustainability.gov.au](http://www.sustainability.gov.au)). The website features content from a variety of Australian Government departments and agencies, covering policies, initiatives and best practice examples of public sector performance, including green procurement and Buy Recycled policies.
- All Australian Government departments and numerous agencies have an Environment Management System (EMS) either in place or under development. Ten departments and agencies have an EMS certified to ISO14001 standards for at least one major site.
- The Department of the Environment, Water, Heritage and the Arts, on behalf of the Australian Government, ensured continued education and communication through the provision of:
  - EMS training packages and support for other departments and agencies through its website and the Sustainability in Government website
  - a waste manual outlining best practice recycling collection facilities
  - guidance on reporting systems for collecting and collating waste management data, and
  - Environmental Purchasing Checklist for Packaging which suggests environmental criteria for use by the Australian Government when purchasing packaging materials.

The Australian Government also provided funding to the following organisations to undertake projects to advance the principles of the Covenant:

- Australian Council of Recyclers (ACOR) in 2006 for the Australian Recycling Values Study
- the 2006/07 Bag Smart Community Outreach to Retailers Program supporting 118 communities in Western Australia to reduce plastic bag use
- the Buy Recycled Business Alliance in 2006/07 to help establish a database of recycled content products ([www.brba.com.au](http://www.brba.com.au)). The database is available to all consumers and promotes the purchase of products with recycled content, which in turn will contribute to the efficiency of recycling by encouraging local markets for recycled materials
- Keep Australia Beautiful Association to undertake the 2006/07 National Litter Index, and
- Sustainable Packaging Alliance in 2006 to contribute to the development of PIQET-1, a tool for rapid environmental impact assessments of packaging.

### 3.2 Term of Action Plan

The Australian Government Action Plan extends from July 2008 to June 2010 and covers the remaining period of the Covenant Mark II. It will be reviewed in June 2009 and adjusted to adapt to emerging opportunities to deliver Covenant targets.

### 3.3 Contact Officer

Requests for information or advice relating to specific activities in the plan should be directed to:

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Product Stewardship Section  
Environment Standards Branch  
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## 4.0 Key Actions

### 4.1 Roles and Undertakings

The Covenant provides a comprehensive list of commitments that signatories should consider when developing their action plans. Of these, the Australian Government has identified the following as being relevant to its operations and the areas where it can be most effective in the stewardship of packaging and paper products:

- apply the principles of this Covenant in internal operations in relation to:
  - the purchase of raw materials
  - the purchase of packaged goods and paper
  - the disposal of used packaging and paper, and
  - the recovery of materials and the purchase of recovered materials.
- work co-operatively to develop good practice collection systems and to develop end markets for recovered materials, including to promote, support

and fund market development initiatives

- facilitate the implementation of purchasing policies for recycled goods and services (nationally), including to identify and seek to remove barriers to the purchase of recycled goods and services
- promote the adoption of the principles and undertakings set out in this Covenant and the benefits of becoming a signatory to the Covenant
- coordinate education and promotion programs and establish an accessible communications framework to facilitate information collation and dissemination
- promote, in co-operation with industry, the provision of resource recovery community education, particularly with regard to the communities role, in good practice collection and sorting schemes
- cooperate in producing reliable data on a national basis on the performance of disposal and materials recovery systems dealing with used packaging and household paper, and
- ensure policy and strategic frameworks are subject to regulatory impact assessment, including environmental, economic and social analysis.

**Table 1** outlines the actions the Australian Government will take to meet these commitments, together with performance indicators to be used to measure and report achievements.

## 4.2 Overarching Targets

The Covenant includes key overarching recycling and waste minimisation targets, including:

- increasing the amount of post consumer packaging recycled from its current rate of 48 per cent (2003 baseline data) to 65 per cent by 2010
- increasing the recycling of difficult or non-recycled materials, including plastics coded (4) to (7) and non-recyclable paper and cardboard packaging from the existing 10 per cent recycling rate (2003 baseline data) to 25 per cent by 2010, and
- ensuring there is no increase in the level of packaging going to landfill (against 2003 baseline data).

The achievement of these targets is to be measured through key performance indicators (KPIs) set out in Schedule 2 of the Covenant. Seven of the 29 indicators are relevant to the Australian Government's operations.

- KPI 15. Percentage of government agencies providing public place recycling infrastructure
- KPI 16. Percentage of signatories providing recycling collection facilities for post-consumer packaging generated on-site
- KPI 21. Estimated tonnage of consumer packaging recycled and sent to landfill respectively, from on-site collection facilities
- KPI 26. Implementation of a Buy Recycled purchasing policy or practice
- KPI 27. Establishment of baseline performance data
- KPI 28. Annual Reporting against Action Plan
- KPI 29. Demonstrating improvement and achievements against individual targets and milestones

These KPIs together with the actions which will be taken to ensure continuous improvement is achieved are outlined in **Table 2**.

To enable the collection and aggregation of robust and consistent packaging waste and recycling data from Australian Government agencies, the Department of the Environment, Water, Heritage and the Arts will, in consultation, develop a user friendly standardised reporting tool to enable all Australian Government agencies to provide accurate data on the use, recovery and recycling of consumer packaging.

**Table 1 - Roles and Responsibility Commitments**

Commitments	Action	Timeline against Actions	Performance Indicator
<b>Principles of the Covenant</b>	As a signatory to the National Packaging Covenant, the Department of the Environment, Water, Heritage and the Arts (the department), on behalf of the Australian Government, will continue to encourage the incorporation of the Covenant principles in government operations in relation to the purchasing of packaged goods and paper, disposal of used packaging and paper, materials recovery and the purchase of recovered materials.	Ongoing	<input type="checkbox"/> Number of agencies incorporating Covenant principles within day to day operations
<b>Collection systems and end markets</b>	<p>The department will continue to explore possible projects to promote, support and fund market development initiatives which promote sustainability in packaging.</p> <p>The Australian Government recommends that agencies develop Environmental Management Systems (EMSs) which include actions to improved sustainability and management of consumer packaging and paper. The department will develop new Model EMS documents which are designed to allow agencies to adapt them to their own specific requirements and form the documentation requirements for a simple office EMS and support better management of used packaging. The department will fund a consultancy to:</p> <ul style="list-style-type: none"> <li>• rewrite the Model EMS templates and guidance documentation to reflect the revised ISO14001:2004 standard</li> <li>• revise and expand the existing 'Guide to EMS' to include implementation and maintenance of an EMS. The guidance will cover both formal/certified systems and less formal systems for small departments/agencies, and</li> <li>• incorporate a packaging waste module into the EMS templates to assist agencies meet their requirements under the Covenant.</li> </ul> <p>The department will work cooperatively with other agencies to develop good practice waste collection systems and to develop end markets for recovered materials by encouraging environmental purchasing and recycling of office waste. Agencies will be encouraged to:</p> <ul style="list-style-type: none"> <li>• provide recycling collection facilities for waste packaging generated by staff</li> <li>• ensure the collection of paper and cardboard for recycling, including classified waste paper, and</li> <li>• monitor the amount of general waste going to landfill and investigate options for recycling/reuse through an EMS.</li> </ul>	<p>Ongoing</p> <p>June 2009</p> <p>June 2009</p> <p>June 2009</p> <p>June 2009</p> <p>Ongoing</p>	<input type="checkbox"/> Projects funded that support packaging sustainability and key outcomes achieved  <input type="checkbox"/> Percentage of departments and agencies with EMSs in place  <input type="checkbox"/> Percentage of departments and agencies with in-house packaging recycling facilities

Commitments	Action	Timeline against Actions	Performance Indicator
<p><b>Collection systems and end markets (continued)</b></p>	<p>In addition, agencies will be required to report annually to the department on the amount of packaging collected for recycling and sent to landfill. To assist agencies in this process, the department will:</p> <ul style="list-style-type: none"> <li>• develop a standardised user-friendly methodology and electronic reporting tool which accounts for the diverse range of government operations and waste management practices, and</li> <li>• provide agencies with a Waste Audit Manual with clear guidance on implementing Covenant requirements.</li> </ul> <p>The Australian National Audit Office will undertake a whole-of-government audit of sustainable office management, including post-consumer packaging. The department will use the results of the audit to review waste collection systems and assist agencies in implementing best practice to meet sustainability targets and policy requirements.</p>	<p>Nov 2008</p> <p>Dec 2008</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Percentage of departments and agencies reporting on the amount of packaging collected for recycling and sent to landfill</li> <li><input type="checkbox"/> Number of agencies provided with the Waste Audit Manual</li> </ul>
<p><b>Purchasing policies</b></p>	<p>The Australian Government is committed to enhancing green procurement. The department will encourage all agencies to create a Chief Executive Instruction (CEI) on procurement outlining how the agency will consider environmental impacts when procuring goods and services. The department will provide guidance to other agencies through updating the Environmental Purchasing Guide and amalgamating with the Green Office Guide.</p> <p>The Australian National Audit Office whole-of-government audit of green procurement will assist agencies in implementing best practice and provide useful guidance for agencies in meeting sustainability targets and procurement requirements.</p> <p>The department will continue to support the Sustainability in Government Program and manage the website. The website features content from a variety of Australian Government departments and agencies, covering policies, initiatives and best practice examples of public sector performance. Relevant state and territory government policies and programs are also linked, providing information relevant to agency operations nation-wide. The site includes a discussion group that allows peer-to-peer communication between staff involved in sustainable purchasing initiatives.</p>	<p>Ongoing</p> <p>Dec 2008</p> <p>Ongoing</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Number of departments and agencies with green procurement CEI in place</li> <li><input type="checkbox"/> Number of hits to Covenant related Sustainability in Government web page</li> <li><input type="checkbox"/> Number of APS staff utilising the Sustainability in Government discussion group</li> <li><input type="checkbox"/> Percentage of departments and agencies with best practice sustainable procurement in place</li> </ul>

Commitments	Action	Timeline against Actions	Performance Indicator
<p><b>Promoting the Covenant</b></p>	<p>The department undertakes to promote the National Packaging Covenant to other departments and agencies in the Australian Government, including participation in the Government Agency Environment Network (GAEN). Actions will include promoting the inclusion of clauses into purchasing contracts and improving staff awareness of the Australian Government’s commitment to the Covenant and its provisions. To facilitate greater communication and understanding of the Covenant the department will circulate and encourage agencies to display a Signatory Registration Certificate in a public area, to aid in public and staff awareness and promote the Covenant.</p>	<p>Ongoing</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Number of agencies provided with the Signatory Registration Certificate</li> <li><input type="checkbox"/> Number of GAEN meetings held where packaging waste management is discussed</li> </ul>
	<p>The department has committed to providing funds for the administration of the Covenant and continue funding for an officer to implement the Covenant across the Australian Government, reflecting Covenant priorities.</p>	<p>Jun 2010</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Examples of actions that promote the Covenant</li> </ul>
	<p>The department will continue to maintain a link to the Covenant webpage on the Department’s website, <a href="http://www.environment.gov.au/settlements/waste/covenant">www.environment.gov.au/settlements/waste/covenant</a>. The Department will ensure the information on the link is readily accessible and reflects the priorities of the Covenant.</p>	<p>Ongoing</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Funding provided to administer the Covenant</li> <li><input type="checkbox"/> Number of hits to the department’s Covenant webpage</li> </ul>
<p><b>Education, communication and community awareness</b></p>	<p>The department is committed to ensuring all Australian Government departments and agencies are fully informed regarding Covenant requirements. The department will undertake information sessions on the requirements of the Covenant, through forums such as GAEN, and provide updated information on the department’s website and the Sustainability in Government website.</p>	<p>Ongoing</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Total amount of funding spent per annum on education, communication and community awareness</li> </ul>
	<p>The department is committed to supporting consumer awareness programs and establishing frameworks to facilitate communication of Covenant principles. Actions include:</p>	<p>Ongoing</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Number of projects funded</li> </ul>
	<ul style="list-style-type: none"> <li>• providing agencies with the Waste Audit Manual to establish a framework for implementing Covenant requirements, and</li> <li>• encouraging staff commitment to sustainability through regular awareness raising activities.</li> </ul>	<p>Dec 2008</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Media coverage of plastic bag reduction message</li> </ul>
	<p>The department will continue to explore funding possible education, communication and community awareness projects linked to national waste priorities as opportunities arise.</p>	<p>Ongoing</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Number of tools developed to assist the use of degradable plastics in Australia</li> </ul>

Commitments	Action	Timeline against Actions	Performance Indicator
<b>Education, communication and community awareness (continued)</b>	<p>The department will continue to support the Publishers National Environment Bureau by developing and publishing advertisements in national publications that promote newsprint recycling to the community. These advertisements, which focus on newsprint, also promote recycling in general, including highlighting the benefits of kerbside recycling and encouraging the purchasing of products manufactured from recovered materials.</p> <p>The department will continue to lead work with Standards Australia to establish standards for degradable plastics and also work with the Plastics and Chemicals Industries Association to encourage the industry to introduce degradable plastics into Australia in an appropriate and sustainable way.</p>	<p>Ongoing</p> <p>Ongoing</p>	<p><input type="checkbox"/> Advertisements developed and booked to the satisfaction of PNEB and within the required timeframe</p>
<b>Optimise value for recycled materials and market development initiatives</b>	<p>The department facilitates the development of programs that optimise the value for recycled materials by encouraging environmental purchasing by agencies. It is anticipated that this action will assist in strengthening demand for, and therefore optimising value from, recycled materials.</p> <p>Additionally, through the Sustainability in Government program, the Australian Government supports better environmental management and purchasing decisions, including those that will develop markets for environmentally-preferable goods and services.</p>	<p>Ongoing</p> <p>Ongoing</p>	<p><input type="checkbox"/> Total projects undertaken to support the use of recycled content products</p> <p><input type="checkbox"/> Number of agencies with 'purchasing recycled content' policies in place</p>
<b>Materials recovery strategies</b>	<p>The department will continue to encourage, through the Sustainability in Government web page, agencies to produce public environmental or sustainability reports, including information on packaging waste recycling, and will use these mechanisms to promote better performance on waste, recycling and purchasing.</p>	<p>Ongoing</p>	<p><input type="checkbox"/> Number of hits to the relevant web page</p> <p><input type="checkbox"/> Number of agencies with PERs</p>
<b>Performance of disposal and materials recovery systems</b>	<p>The department undertakes to collect and collate data on the performance of disposal and materials recovery systems used by Australian Government agencies. The department also undertakes to produce public reports on environmental performance using the Global Reporting Initiative (GRI) indicators regarding waste, recycling and purchasing. This will encourage consistency and reliability in data reported.</p> <p>The department will fund a feasibility study into the development of a comprehensive, national waste database to provide nationally consistent, robust data on waste, including types and volumes of waste generation, recycling levels and the valuation of environmental impacts and benefits.</p>	<p>Ongoing</p> <p>Nov 2008</p>	<p><input type="checkbox"/> Total amount of funding spent per annum on projects</p> <p><input type="checkbox"/> Reporting systems in place</p> <p><input type="checkbox"/> Percentage of agencies reporting</p> <p><input type="checkbox"/> Examples of disposal and materials recovery projects undertaken</p>

Commitments	Action	Timeline against Actions	Performance Indicator
<p><b>Performance of disposal and materials recovery systems (continued)</b></p>	<p>The department will continue to show leadership in recycling by applying environmentally responsible principles in the workplace through a network of eco-net officers. The department will encourage other Australian Government agencies to develop an internal network of staff committed to improving the environmental performance with their agency, including waste packaging management.</p>	<p>Ongoing</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Number of agencies with a staff network concerned with promoting environmental awareness, including recycling of packaging waste</li> <li><input type="checkbox"/> Number of Eco-net meetings held annually</li> <li><input type="checkbox"/></li> </ul>
<p><b>Purchase of recycled content goods and services</b></p>	<p>The department will encourage agencies to utilise the Buy Recycled Business Alliance Recycled Product Database when making procurement decisions.</p> <p>The implementation of purchasing policies to remove barriers for purchasing recycled content goods and services will be facilitated by the department through the development of a new policy framework for government environmental performance. This will build on the voluntary Environmental Purchasing Guide and various environmental purchasing checklists available and under development to assist the implementation of policies for the purchasing of environmentally-preferable goods and services.</p>	<p>Ongoing</p> <p>Ongoing</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Number of agencies with purchasing policies</li> <li><input type="checkbox"/> Development of policy framework for environmental performance</li> </ul>
<p><b>Industry waste reduction management agreements/plans</b></p>	<p>If appropriate, the department will continue to ensure that any negotiated industry waste reduction management agreements/plans, involving packaging, will conform to the Covenant by processes maintained through the Covenant Council Secretariat.</p>	<p>Ongoing</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Number of agreements involving packaging negotiated</li> </ul>
<p><b>Implementation of the National Environment Protection (Used Packaging Materials) Measure (NEPM)</b></p>	<p>As a member of the Environment Protection and Heritage Council (EPHC), the Australian Government is committed to the principles of the Covenant and supports the implementation of the NEPM. However the Australian Government does not administer a national NEPM as the only Australian Government brand owner is already a signatory to the Covenant. The department will continue to monitor this brand owner.</p>	<p>Ongoing</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Actions taken to implement the Used Packaging Materials NEPM</li> </ul>



**Table 2 - National Packaging Covenant Key Performance Indicators relevant to Australian Government operations**

**Provision of Collection Services for post consumer packaging and paper**

<b>Key Performance Indicator (KPI)</b>	<b>Action</b>
15. Percentage of government agencies providing public place recycling infrastructure	<p>The Department of the Environment, Water, Heritage and the Arts (the department) will investigate, through its waste audit, the number of agencies providing public place recycling infrastructure and identify which agencies potentially should provide public place recycling facilities. Factors such as security and remoteness will be considered as part of the feasibility processes.</p> <p>The department will continue to encourage the provision of collection bins for recyclable material in national parks where practical and review opportunities for reusing and recycling materials in national parks. Opportunities for access to markets for recycled waste and systems for monitoring waste disposal will be explored for parks in remote areas.</p> <p>The department will continue to encourage the provision of collection bins for recyclable material in all Australian Government shopfronts and public access areas in government buildings.</p>
16. Percentage of signatories providing recycling collection facilities for post-consumer packaging generated on-site	<p>The department will encourage Australian Government agencies to establish appropriate waste recycling schemes for government buildings.</p>

**Increased recycling of used packaging**

<b>Key Performance Indicator</b>	<b>Action</b>
21. Estimate tonnage of consumer packaging recycled and sent to landfill respectively, from on-site collection facilities	<p>Australian Government agencies will be required to report on the tonnage of consumer packaging being recycled and going to landfill. Agencies will be encouraged to undertake waste audits.</p> <p>Agencies will provide data by September each year to the department for aggregation into the Australian Government Annual Report.</p>

**Secondary market creation supported for recovered packaging material**

<b>Key Performance Indicator</b>	<b>Action</b>
26. Implementation of Buy Recycled purchasing policy or practices	<p>Australian Government agencies will continue to encourage improved environmental performance of suppliers through the use of the Environmental Purchasing Guide and the Sustainability in Government website.</p>

**Continuous improvement demonstrated against baseline data and all relevant KPIs**

<b>Key Performance Indicator</b>	<b>Action</b>
27. Establishment of baseline performance data	<p>The department, with support from other agencies and an external consultancy, will undertake to ensure baseline performance data is accurate and the data collection methodology is robust.</p>
28. Annual Reporting against Action Plans	<p>On 31 October each year actions will be reported to the Covenant Council against relevant commitments and relevant KPIs.</p>

29. Demonstrated improvement and achievements against individual targets and milestones	There is an expectation that Australian Government performance against these commitments will continue to improve over time. Internal performance audits and external audits such as ANAO reviews will also be used to monitor improvement of performance and achievements.
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