

**CARBON DISCLOSURE PROJECT**

**CDP6 Greenhouse Gas Emissions Questionnaire - Avery Dennison Corporation**

[Print Response](#)**Respondent: Avery Dennison Corporation**

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**General Information**

It is not a requirement of the CDP questionnaire to give an introduction to your answer, but if you would like to do so, please give it here in the text box below or attach a document.

Avery Dennison is responding to the series of Carbon Disclosure Project (CDP) information requests for a third time, having published the Company's initial response to the CDP4 questionnaire in 2006. Avery Dennison is a global leader in pressure-sensitive labeling materials, office products, and retail tag, ticketing and branding systems.

Where available please can you provide the following identification numbers for your primary listings/ordinary shares and information for your company:

Company Turnover (also known as sales) in millions of US\$

ISIN number

CUSIP number

SEDOL number

**1 - Risks and Opportunities****Question 1(a)(i) Regulatory Risks**

How is your company exposed to regulatory risks related to climate change?

We do not consider our company to be exposed to regulatory risks because...

Avery Dennison has an ongoing process of tracking developments related to climate change and evaluating the potential impacts (including key risks and opportunities) to its business operations. While Avery Dennison acknowledges that climate change is an important global issue, the Company does not believe that climate change represents a significant direct risk to its operations. As observed in its initial GHG emissions inventory, which the Company is currently finalizing, the Company's enterprise-wide energy usage and associated greenhouse gas (GHG) emissions are very low in comparison to other industry sectors.

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

No

**Question 1(a)(ii) Physical Risks**

How is your company exposed to physical risks from climate change?

We do not consider our company to be exposed to physical risks because...

Avery Dennison does not anticipate manufacturing or distribution facilities being significantly impacted by

extreme weather events. The Company's facilities are typically located inland, and thus would not be significantly impacted by sea level rise or hurricanes. In addition, Avery Dennison's facilities are insured as Highly Protected Risk (HPR) properties.

While Avery Dennison could potentially experience disruptions to its supply chain (e.g., shortage or delay of key raw materials such as specialty papers or films) resulting from extreme weather events, the Company continually seeks to qualify alternative suppliers on a global basis to mitigate the consequences of such an event. The Company does not anticipate significant disruptions in the physical distribution of its products following an extreme weather event.

Extreme weather events could reduce demand for the Company's products from customers impacted by such events; however, given the Company's breadth of operations globally, and relatively low degree of customer/industry concentration, reduction in demand by certain customers following an extreme weather event is not considered to be a significant risk to the Company's financial results.

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

No

### **Question 1(a)(iii) General Risks**

How is your company exposed to general risks as a result of climate change?

We do not consider our company to be exposed to general risks because...

As observed in its initial GHG emissions inventory, which the Company is currently finalizing, the Company's enterprise-wide energy usage and associated greenhouse gas (GHG) emissions are very low in comparison to other industry sectors and therefore the general risk internationally and in the United States is low in comparison with many sectors. With regard to energy usage, Avery Dennison primarily utilizes natural gas for drying ovens, emissions control equipment, and heating/cooling of manufacturing operations and office operations. In addition, the Company purchases electricity for the same uses. To a much lesser degree, the Company utilizes diesel and other fuels.

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

No

### **Question 1(a)(iv) Risk Management**

Has your company taken or planned action to manage the general and regulatory risks and/or adapt to the physical risks you have identified?

We have taken or planned action.

Avery Dennison has an ongoing process of tracking developments related to climate change and evaluating the potential impacts (including key risks and opportunities) to its business operations. For reasons specified in the Company's CDP5 response, the Company expects potential impacts from extreme weather events, supply chain disruptions, and changes in customer demand to be minimal.

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

No

**Question 1(a)(v) Financial and Business implications**

How do you assess the current and/or future financial effects of the risks you have identified and how those risks might affect your business?

We assess current and/or future financial effects by...

Avery Dennison understands that a key impact of pending climate change legislation in the United States could be increased energy and electricity costs to operations. Therefore, Avery Dennison is reviewing options for decreasing the energy (natural gas and electricity) usage in key divisions that have greatest exposure to energy costs.

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

No

**Question 1(b)(i) Regulatory Opportunities**

How do current or anticipated regulatory requirements on climate change offer opportunities for your company?

We consider that current or anticipated regulatory requirements offer opportunities because...

Avery Dennison recognizes the opportunity to reduce energy usage in order to be more competitive, which represents an opportunity to the organization. By being more efficient with manufacturing products, from an energy perspective, Avery Dennison is minimizing the potential for regulatory impacts as well as saving money and improving competitiveness.

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

No

**Question 1(b)(ii) Physical Opportunities**

How do current or anticipated physical changes resulting from climate change present opportunities for your company?

We do not consider that current or anticipated physical changes offer opportunities because...

Avery Dennison does not see present opportunities for the organization as a result of anticipated physical changes associated with climate change.

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

No

**Question 1(b)(iii) General Opportunities**

How does climate change present general opportunities for your company?

We consider that climate change offers opportunities because...

With respect to opportunities for products and services, the Company sees potential benefits in two key areas.

First, the Company is developing a new business to provide materials (inlays and tags) for use in radio frequency identification (RFID) applications. RFID technology enables large-scale retail organizations, the Department of Defense, consumer product companies, and other businesses to track their products more efficiently throughout the supply chain, allowing them to optimize product shipment and transportation, thereby potentially reducing transportation GHG emissions. Avery Dennison believes there is substantial likelihood of increased demand for this type of technology to reduce losses associated with stock outs and other supply chain inefficiencies, including the need for companies to reduce their GHG emissions profile.

Second, as a supplier of paper and film-based materials and products sold by major retailers, the Company seeks to develop environmentally-friendly products and products that minimize waste.

An example of the Company's development of environmentally-friendly products is the recent launch by the Retail Information Services (RIS) division of a green product line which includes environmentally certified papers, organic cotton and recycled polyester printed fabric labels, organic cotton and bamboo woven labels, and biodegradable packaging materials, many of which are anticipated to have a reduced climate impact. Additional examples include development of products which use thinner liners, linerless labels and reduction packaging content.

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

No

#### **Question 1(b)(iv) Maximizing Opportunities**

Do you invest in, or have plans to invest in products and services that are designed to minimize or adapt to the effects of climate change?

Climate change has led to investment or planned investment in order to maximise climate change opportunities.

Avery Dennison is currently investigating the development of a formal process for the evaluation of suppliers and adding green criteria for supplier selection.

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

No

#### **Question 1(b)(v) Financial and Business Implications**

How do you assess the current and/or future financial effects of the opportunities you have identified and how those opportunities might affect your business?

We assess current and/or future financial effects by...

Avery Dennison anticipates a changing business climate with an additional focus on climate change such that customers are requesting alternate products that have green or energy efficient profiles. Avery Dennison understands that financial performance will be linked with being able to provide key products to customers as needs change with the dynamic business landscape. Therefore, Avery Dennison continually evaluates the marketplace and voice of the customer to assess the future financial effects of opportunities driven by climate change.

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

No

## 2 - Greenhouse Gas (GHG) Emissions Accounting

### Question 2(a)(i) Reporting Boundary

Calculation tools that will assist companies in calculating GHG emissions from particular activities, such as the combustion of fuels, production processes, etc can be found at: <http://www.ghgprotocol.org/calculation-tools/all-tools>. Companies new to emissions reporting are strongly recommended to use these tools to assist them in their calculations. If you have used a calculation tool, please list it under the question on methodologies.

Please indicate the category that best describes the company, entities or group for which your response is prepared:

[Companies over which operational control is exercised.](#)

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

Yes

[For Avery Dennison&s baseline GHG inventory, the Company used operational control criteria for setting organizational boundaries. With regard to operational boundaries, the Company focused primarily on Scope 1 \(direct\) and Scope 2 \(indirect emissions from purchased electricity\). Scope 3 emissions, or supply chain contributions, were not quantified.](#)

### Question 2(a)(ii) Reporting Year

Please explicitly state the dates of the accounting year or period for which GHG emissions are reported.

[Dates not selected.](#)

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

Yes

[Avery Dennison&s base year emissions inventory will be for calendar year 2005. The Company has also begun to collect activity data to quantify 2006 and 2007 GHG emissions in the first and second quarter of 2008.](#)

[Avery Dennison is currently completing a quality assurance review of the Company&s initial emissions inventory for calendar year 2005 and will be providing the data to the CDP in the future upon incorporation of new facilities into the baseline inventory due to a recent acquisition. Avery Dennison added approximately 80 new facilities to its 2005 GHG emission inventory upon the acquisition of Paxar. Therefore, Avery Dennison is adjusting the 2005 emission inventory to account for the GHG emissions generated by these newly acquired facilities.](#)

### Question 2(a)(iii) Methodology

Please specify the methodology used by your company to calculate GHG emissions.

Please select the methodology that you have used using the radio buttons.

If you have used the GHG Protocol or ISO 14064-1, please also give references to any calculation tools that you have used or an explanation of any calculation methods that you have devised yourself. Please explain the data sources of the Global Warming Potentials and emission factors used in your calculations. If you cannot find a reference for them within a supplied calculation tool, please contact the provider of the calculation tool for the information.

If you have used a methodology that you have devised yourself, please would you explain your methodology, including methods of calculation, and the data sources of the Global Warming Potentials and emission factors.

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

Yes

With respect to emission calculation methodologies, the Company followed guidance in the internationally accepted GHG Protocol issued by the World Resources Institute/World Business Council for Sustainable Development, as well as the California Climate Action Registry General Reporting Protocol, and EPA Climate Leaders GHG Inventory Protocol.

### Question 2(b)(i) Scope 1 and Scope 2 of GHG Protocol

Are you able to provide a breakdown of your direct and indirect emissions under Scopes 1 and 2 of the GHG Protocol and to analyse your electricity consumption?

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

No

### Question 2(b)(i)(y) Scope 1 and Scope 2 of GHG Protocol - Year 1 answers

Please enter the dates for the reporting period that you specified in (answer to question 2(a)(i)) , and then answer the questions for that period. By selecting the &Add Additional Year Figures& button at the end of this webpage, you can repeat the process for the previous reporting period, and then for the reporting period before that, and so on. If possible, please give data going back to the reporting period ending in 2004. You do not have to enter historical data if you have already reported this information in response to previous CDP questionnaires.

Please enter the accounting year used to report GHG emissions details below.

Dates not selected.

Scope 1 Direct GHG Emissions: Please provide:

a. Total global Scope 1 activity in Metric Tonnes CO<sub>2</sub>-e emitted.

b. Total Scope 1 activity in Metric Tonnes CO<sub>2</sub>-e emitted for Annex B countries.

By country - Scope 1 activity in metric tonnes of CO<sub>2</sub>-e by individual country

Using the same methodology please state your emissions per country. NB : If it is not practical for you to list emissions on a full country by country basis, please list here countries with significant emissions in the context of your business and combine the remainder under &rest of world&. If you already have this information in another

format (e.g Excel) please attach it.

**Country Scope 1 Emissions  
(metric tonnes CO2-e)**

Scope 2 - Indirect GHG emissions: Please provide:

c. Total global Scope 2 activity in metric tonnes CO2-e emitted

d. Total Scope 2 activity in metric tonnes CO2-e emitted for Annex B countries

By country - Scope 2 activity in metric tonnes of CO2-e by individual country

**Country Scope 2 Emissions  
(metric tonnes CO2-e)**

Electricity consumption

e. Total global MWh of purchased electricity

f. Total MWh of purchased electricity for Annex B countries

By country & MWh of purchased electricity by individual country.

**Country**

g. Total global MWh of purchased electricity from renewable sources

h. Total MWh of purchased electricity from renewable sources for Annex B countries

By country & MWh of purchased electricity from renewable sources by individual country.

**Country**

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

Yes

[Avery Dennison is currently finalizing GHG emissions \(due to recent acquisition of additional facilities\) and](#)



performing a quality assurance review of the Company's initial emissions inventory for calendar year 2005.

Avery Dennison has taken initiative to collect electricity consumption from all facilities for calendar years 2005, 2006, and 2007.

### **Question 2(b)(ii) Scopes 1 and 2 of GHG Protocol**

If you are unable to detail your Scope 1 and Scope 2 GHG emissions and/or electricity consumption, please report the GHG emissions you are able to identify together with a description of those emissions. If you have answered 2(b)(i), please go to question 2(c)(i).

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

### **Question 2(c)(i) Other Emissions & Scope 3 of GHG Protocol**

How do you identify and/or measure Scope 3 emissions?

Currently, Avery Dennison does not quantify Scope 3 emissions as part of its GHG inventory program.

Please provide where possible:

- a. Details of the most significant Scope 3 sources for your company.
  
- b. Details in metric tonnes CO<sub>2</sub>-e of GHG emissions in the following categories:
  - i Employee business travel.
  
  - ii External distribution/logistics
  
  - iii Use/disposal of company's products and services.
  
  - iv Company supply chain.
  
- c. Details of the methodology you use to quantify or estimate Scope 3 emissions.

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

No

**Question 2(d) External Verification**

(i) Has the information reported in response to Questions 2(b)- (c) been externally verified or audited or do you plan to have the information verified or audited?

No (Please go to question 2 (e))

(ii) If your answer to question 2d(i) is Yes, please provide or attach a copy of the audit or verification statement or state your plans for verification.

(iii) Please specify the standard or protocol against which the information has been audited or verified.

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

**Question 2(e) Data Accuracy**

Does your company have a system in place to assess the accuracy of GHG emissions inventory calculation methods, data processes and other systems relating to GHG measurement? If so, please provide details. If not, please explain how data accuracy is managed.

Yes, we do have a system.

Avery Dennison employs a third party software solution to gather GHG input data in order to document the data inputs and improve the accuracy and efficiency of the GHG emissions inventory process. Avery Dennison will be migrating this current system to an active calculation system for calendar year 2008 emissions.

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

**Question 2(f) Emissions History**

Do the emissions reported for your last accounting year vary significantly compared to previous years? If so, please explain reasons for the variations.

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

Yes

This question is not applicable to Avery Dennison

**Question 2(g) Emissions Trading**

i) Does your company have facilities covered by the EU Emissions Trading Scheme?

No, we do not. (Please go to question 2(g)(ii) below)

If so:

a) Please provide details of the annual allowances awarded to your company in Phase I for each of the years from 1 January 2005 to 31 December 2007 and details of allowances allocated for Phase II commencing on 1 January 2008.

In all cases, please enter whole numbers without punctuation, For example, enter 2000 instead of 2,000.

Please enter allowance in Metric Tonnes of CO2:

1 January 2005-31 December 2005

1 January 2006-31 December 2006

1 January 2007-31 December 2007

b) Please provide details of actual annual emissions from facilities covered by the EU ETS with effect from 1 January 2005.

Please enter emissions in Metric Tonnes of CO2.

1 January 2005-31 December 2005

1 January 2006-31 December 2006

1 January 2007-31 December 2007

Phase II annual allowances

1 January 2008 & 31 December 2008

1 January 2009 & 31 December 2009

1 January 2010 & 31 December 2010

1 January 2011 & 31 December 2011

1 January 2012 & 31 December 2012

c) What has been the impact on your company's profitability of the EU ETS?

ii) What is your company's strategy for trading or participating in regional and/or international trading schemes (eg: EU ETS, RGGI, CCX) and Kyoto mechanisms such as CDM and JI projects? Explain your involvement for each of the following:

EU ETS

CDM/JI

CCX

RGGI

Others

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

Yes

With respect to emissions trading, the Company is still monitoring existing programs and assessing the business value of participation in such programs. Given the relatively low GHG emissions profile of Avery Dennison's facilities, the need for a robust emissions trading strategy associated with mandatory regulatory programs is not a significant priority for the Company at this time. In addition, the EU ETS does not apply to Avery Dennison. Avery Dennison is monitoring federal GHG legislation in the United States to determine potential impacts and emissions trading opportunities.

### Question 2(h) Energy Costs

i) Please identify the total costs in US \$ of your energy consumption eg from fossil fuels and electric power.

If you want to enter a number less than 1, please ensure you use a decimal point (e.g. 0.3) and NOT a comma (e.g. 0,3)

ii) What percentage of your total operating costs does this represent?

iii) What percentage of energy costs are incurred on energy from renewable sources?

More details

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

Yes

Avery Dennison has taken initiative to collect electricity consumption from all facilities for calendar years 2005, 2006, and 2007. Avery Dennison has also implemented energy management teams for two business units.

### 3 - Performance

#### Question 3(a) Reduction Plans

i) Does your company have a GHG emissions reduction plan in place? If so, please provide details along with the information requested below. If there is currently no plan in place, please explain why.

No, we do not currently have a plan in place for the following reason(s):

GHG emission reduction or energy reduction targets have not been finalized. Baseline data for 2005 are being updated for a recent acquisition, and realistic reduction targets are currently being assessed. Avery Dennison is developing a climate change strategy, which involves evaluating energy/emissions reduction targets and development of products that foster sustainability. The Company will continue tracking climate change developments, assessing business risks, and identifying business opportunities, as appropriate.

As indicated in Avery Dennison's CDP5 response, the Company will focus on achieving cost-effective GHG emission reductions through targeted energy efficiency initiatives. The Company has conducted energy audits at its EU locations and is planning a similar effort at facilities in the United States in the near future. Avery Dennison has upgraded to more energy efficient emissions control devices. Avery Dennison also is continuing to evaluate energy efficiency improvements for coating dryers across the company, which will result in GHG emissions reductions. Similarly, the Company is evaluating the use of compressed air systems and more energy efficient control devices.

ii) What is the baseline year for the emissions reduction plan?

If you want to give further information or describe a rolling target, please do so here.

Avery Dennison is currently completing a quality assurance review of the Company's initial emissions inventory for calendar year 2005.

iii) What are the emissions reduction targets and over what period do those targets extend?

GHG emission reduction or energy reduction targets have not been finalized.

iv) What activities are you undertaking to reduce your emissions eg: renewable energy, energy efficiency, process modifications, offsets, sequestration etc? What targets have you set for each and over what timescales do they extend?

Avery Dennison has recently initiated the collection of energy consumption data along with the ongoing collection of GHG activity data. Avery Dennison is currently looking at the overall organization's data to establish energy

reduction targets.

v) What investment has been or will be required to achieve the targets and over what time period?

Any such investment and time period to achieve these targets are to be determined.

vi) What emissions reductions and associated costs or savings have been achieved to date as a result of the plan?

Tracking mechanisms to evaluate cost savings and/or emission reductions resulting from progress towards the reduction targets are being developed.

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

No

### Question 3(b) Emissions Intensity

i) What is the most appropriate measurement of emissions intensity for your company?

Other

Avery Dennison has gathered preliminary emissions intensity data for the business units, but has not yet determined a single metric that will best represent its emissions intensity performance.

Please give your company's emissions intensity figure for the measurement given above.

If you want to enter a number less than 1, please ensure you use a decimal point (e.g. 0.3) and NOT a comma (e.g. 0,3)

ii) Please state your GHG emissions intensity in terms of total tonnes of CO<sub>2</sub>-e reported under Scope 1 and Scope 2 per US \$m turnover and EBITDA for the reporting year.

Scope 1/ US\$millions turnover

Scope 2/ US\$millions turnover

Scope 1/ EBITDA

Scope 2/ EBITDA

iii) Has your company developed emissions intensity targets?

No, we have not developed emission intensity targets for the following reason(s):

Avery Dennison has not finalized a metric that will best represent its emissions intensity performance. The Company will have more information on these items later in 2008.

a) If the answer to part (iii) above is yes, please state your emissions intensity targets

b) If the answer to part (iii) above is yes, please state what reductions in emissions intensity have been achieved against targets and over what time period.

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

No

### Question 3(c) Planning

Do you forecast your company's future emissions and/or energy use?

No, we do not (Please take the opportunity to explain why not and then go to question 4 a)

At present, Avery Dennison does not estimate future GHG emissions.

i) Please provide details of those forecasts, summarize the methodology used and the assumptions made.

If you are able to give quantified forecasts of Scope 1 and Scope 2 emissions and/or electricity consumption, you can enter numerical data on the next page.

ii) How do you factor the cost of future emissions into capital expenditure planning?

iii) How have these considerations made an impact on your investment decisions?

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

No

### Question 3(c) (i) Planning - Forecasted emissions/electricity use - Year 1 answers

This page gives you the opportunity to give numerical forecasts for emissions and electricity use. If possible, please provide emissions forecasts for the next five reporting periods. Use the &Add additional year figures& button at the end of the page to enter emission forecasts for successive reporting periods. Note: Please enter whole numbers without punctuation. For example, use 2000 instead of 2,000

Please enter the accounting period used to report GHG emissions details below.

Dates not selected.

Forecasted Scope 1 Direct GHG Emissions: Please provide:

- a. Forecasted Total global Scope 1 emissions in Metric Tonnes CO<sub>2</sub>-e.
  
- b. Forecasted Total Scope 1 emissions in Metric Tonnes CO<sub>2</sub>-e for Annex B countries.

By country - Forecasted Scope 1 emissions in Metric Tonnes of CO<sub>2</sub>-e by individual country

Using the same methodology please state your emissions forecasts per country. NB : If it is not practical for you to list emissions on a full country by country basis, please list here countries with significant emissions in the context of your business and combine the remainder under &rest of world&. If you already have this information in another format (e.g Excel) please attach it.

**Country Scope 1 Emissions  
(metric tonnes CO<sub>2</sub>-e)**

Scope 2 Indirect GHG emissions: Please provide:

- c. Forecasted total global Scope 2 emissions in Metric Tonnes CO<sub>2</sub>-e
  
- d. Forecasted total Scope 2 emissions in Metric Tonnes CO<sub>2</sub>-e for Annex B countries

By country - Forecasted Scope 2 emissions in Metric Tonnes of CO<sub>2</sub>-e by individual country

**Country Scope 2 Emissions  
(metric tonnes CO<sub>2</sub>-e)**

Forecasted electricity consumption

- e. Forecasted total global MWh of purchased electricity
  
- f. Forecasted total MWh of purchased electricity for Annex B countries

By country & Forecasted MWh of purchased electricity by individual country.

**Country**

- g. Forecasted total global MWh of purchased electricity from renewable sources



h. Forecasted total MWh of purchased electricity from renewable sources for Annex B countries

By country & Forecasted MWh of purchased electricity from renewable sources by individual country.

### Country

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

No

## 4 - Governance

### Question 4(a) Responsibility

Does a Board Committee or other executive body have overall responsibility for climate change? If not, please state how overall responsibility for climate change is managed. If so, please answer parts (i) and (ii) below.

Yes, an executive body does have overall responsibility for climate change.

i) Which Board Committee or executive body has overall responsibility for climate change?

The Company has a Corporate Sustainability Committee and Director of Corporate Sustainability to provide focus and accountability with respect to climate change and other sustainability issues. A Sustainability Core Team comprised of operations and marketing leaders of each of the company's business units works with the Director to drive the Sustainability initiatives and process through the organization. Avery Dennison's GHG initiative continues to be a key component within the Company's environmental management function.

ii) What is the mechanism by which the Board or other executive body reviews the company's progress and status regarding climate change?

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

No

### Question 4(b) Individual Performance

Do you assess or provide incentive mechanisms for individual management of climate change issues including attainment of GHG targets? If so, please provide details.

No, we do not.

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

Yes

At this time, the Company has not yet established GHG reduction targets nor has it determined whether incentive mechanisms for managers are warranted with respect to GHG targets.

**Question 4(c) Communications**

Please indicate whether you publish information about the risks and opportunities presented to your company by climate change, details of your GHG emissions and plans to reduce emissions through any of the following communications:

i) the company's Annual Report or other statutory filings

No

ii) formal communications with shareholders or external parties

No

iii) voluntary communications such as Corporate Social Responsibility reporting

No

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

Yes

At this time, there is no formal communications on climate change and the company's GHG program. Later in 2008, such communications are anticipated when the company's 2005 baseline is established and GHG and energy reduction targets are announced.

**Question 4(d) Public Policy**

Do you engage with policymakers on possible responses to climate change including taxation, regulation and carbon trading? If so, please provide details.

No

Would you like to provide any additional information relating to this question that you have not provided elsewhere?

No