The New Zealand Ecolabelling Trust

Proposed Licence criteria for

Pre-painted and resin-coated metal products

EC-57-25

Open for comment until 4 July 2025

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Specification change history

Minor clarifications, corrections or technical changes made since the specification was last reviewed and issued in xxx.

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1 INTRODUCTION

Eco Choice Aotearoa (ECA) is an environmental labelling programme which has been created to help businesses and consumers find products and services that ease the burden on the environment. The programme results from a New Zealand Government initiative and has been established to improve the quality of the environment by minimising the adverse environmental impacts generated by the production, distribution, use and disposal of products, and the delivery of services. The programme is managed by the New Zealand Ecolabelling Trust (The Trust).

ECA operates to the ISO 14024:1999 standard "Environmental labels and declarations – Type 1 Environmental labelling - Principles and procedures" and The Trust is a member of the Global Ecolabelling Network (GEN) an international network of national programmes also operating to the ISO 14024 standard.

ISO 14024 requires environmental labelling specifications to include criteria that are objective, reasonable and verifiable. It requires that interested parties have an opportunity to participate and have their comments considered. It also requires that environmental criteria be set, based on an evaluation of the environmental impacts during the actual product or service lifecycle, to differentiate product and services on the basis of preferable environmental performance.

The lifecycle approach is used to identify and understand environmental issues (adverse or beneficial impacts) across the whole life of a product or service (within a defined product or service category). This information is evaluated to identify the most significant issues and from those to identify the issues on which it is possible to differentiate environmentally preferable products or services from others available in the New Zealand market. Criteria are then set on these significant and differentiating issues. These must be set in a form and at a level that does differentiate environmentally preferable products or services, is attainable by potential ECA licence applicants and is able to be measured and verified. As a result of this approach, criteria may not be included in an ECA specification on all aspects of the lifecycle of a product or service. If stages of a product or service lifecycle are found not to differentiate environmentally preferable products or services, or to have insufficient data available to allow objective benchmarking in New Zealand, those stages will not generally be included in criteria in the specification. For some issues, however, (such as energy and waste) criteria may be set to require monitoring and reporting. These criteria are designed to generate information for future reviews of specifications.

The Trust is pleased to publish this ECA specification for Pre-painted and Resin-coated Metal Products. The specification provides a means to recognise products that are demonstrably environmentally preferable but are not covered by an existing ECA specification.

This specification sets out the requirements that Pre-painted and Resin-coated Metal Products must meet to be licensed to use the ECA Label. The requirements include environmental criteria and product characteristics that are generally applicable to a wide range of products and which are common to other ECA specifications.

The process set out in the proposed specification will require the ECA Licence holders to provide a significant amount of information on management and improvement programmes. Information will be required that is of sufficient quality for The Trust to understand and monitor performance and improvement of performance over time. The Trust will use this information to inform future reviews of this specification, including to set criteria that differentiate the product based on environmental preference across the product lifecycle.

This specification is valid for a period of five years. Twelve months before the expiry date (or at an earlier date if required), The Trust will initiate a further review process for the specification.

Notes:

The Trust published its first ECA specification for Pre-painted and resin-coated material products in 2016. The specification was reviewed and revised in 2023.

The Trust is now proposing another a review of EC-57 or Pre-painted and resin-coated metal products. This review includes the following proposed changes:

1 Updating the Legal Requirements criteria
2 Addition of Environmental Management Systems Criteria
3 Update to Modern slavery and social accountability Criteria (including Appendix A)
4 Update to 5.6 Paint System
5 Update to 5.7 Resin Coating
6 Addition of 5.11 Waste Management Criteria
7 Update to Energy Management and greenhouse gas emissions Criteria

The proposed revisions are to bring this specification in line with other, recently revised, ECA specifications. Where changes to the current requirements are proposed in this specification, they are shown as either red ~~strikeout~~ (for text proposed to be deleted) or red underlined (for new text).

The Trust invites comments from interested parties.

2 BACKGROUND

ECA specification EC-41 Flat and Long Steel Products covers the manufacture of long and flat metal coated steel products, from steelmaking through to metal coating including:

- Long steel for construction products
  - steel bar and coil
  - steel wire rod
- Finished long steel construction products
  - steel bar and rod, such as reinforcing bar or rod
  - steel wire and wire products, such as nails, reinforcing wire, etc.
  - steel seamless pipe, tube and associated fittings
  - steel flats, angles and channels
  - welded wire mesh.
- Flat steel products
  - plate
  - strip
  - hollow sections
  - large diameter welded pipe
  - structural beams (including welded beams)
- Assembled steel products (including welded or assembled products)

ECA specification EC-62 Aluminium Building Products covers the manufacture of aluminium products prior to painting, or that have undergone alloy coating, surface passivation, or powder coating.

This EC-57 specification covers more of the metal value chain and includes the painting or coating, and rollforming or pressing, of flat metal products.

A significant proportion of the coated and painted flat steel in the New Zealand market is used in the residential and commercial construction sectors (particularly for roofing). Pre-painted aluminium can also be used for roofing.

In addition to metal coatings comprising zinc, zinc and aluminium, or zinc, aluminium and magnesium, additional coatings (predominately resins or paints) are applied to steel coil or pressed flat steel or aluminium to provide protection and create products that are fit-for-purpose from both an aesthetic and functional perspective. Examples include structural products (such as framing, purlins and girts), roofing, cladding and fencing. Framing, purlins and girts may be coated with a resin to protect them during transport and onsite during construction. Other structural products, such as decking, roofing, cladding and fencing may be pre- or post-painted to help deliver on aesthetic and functional requirements.

The majority of painted steel or aluminium used in the construction sector is pre-painted or resin-coated - i.e. metal which is painted or coated within the manufacturing process, prior to assembly or installation. Products which are painted or coated after forming or assembly are termed post-painted or coated products, and are often powder coated e.g. automobiles, household appliances and furniture. Powder coated steel furniture and fittings are covered under ECA specification EC-32.

There is one integrated manufacturer in New Zealand, where steel is produced, coated, and painted. There are two other significant manufacturers (in terms of volume) who paint and form steel coil, and several organisations who specialise in rollforming coated and painted coil. Steel coil also enters the New Zealand supply chain from overseas for painting or coating, pressing or rollforming, and as finished product ready for installation.

The main processing and finishing stages for pre-painted and resin-coated metal products are described below:

- **Feedstock i.e.** (Metal coated steel strip). Generally, the metal strip will not be passivated, but in some cases, this may have been undertaken as part of the metal coating process. The metal may also enter the product system with a protective oil coating.
- **Primer & pre-treatment**: the strip is cleaned, and a conversion coating applied to ensure good paint adhesion. Primers are used as a thin layer to improve corrosion resistance: previously, these commonly contained hexavalent chromium (which is a known carcinogen) as a passivant. Alternative passivating techniques have been (or are being) developed and are implemented to a varying extent for different product categories. Generally, primers are solvent-based; however, there are trials that have been (or are being) undertaken to assess the feasibility of water-borne primers.
- **Backer**: a protective backing coat is applied to protect the back surface against marking during the colour coating process and transport, and to protect the product from corrosion. For performance and aesthetic reasons, double-sided product may also be produced. Backer coatings can be water or solvent-based.
- **Topcoat**: the top coat or finish coat provides further protection for the strip and is also often driven by the aesthetics required of the final product, particularly for roofing, fencing and walling applications. In some cases, aggregate is added with the topcoat. In New Zealand, water-borne paints are commonly used as top-coats in place of traditional solvent-based paints.
- **Resin**: where a passivated metallic-coated product is not painted this may have a resin applied to further protect the metal during transport and onsite.
- **Finishing:** the process of cutting and shaping the flat metal into the final shape or profile. When rollformed, the strip is passed through several pairs of mated profile rolls which gradually and progressively change the shape of a section, resulting in the 'wave' profile associated with steel roofs.

Alternatively, the strip may be folded to create harder angles familiar in the profiles of framing and guttering. Flat steel strip may also be pressed or cut to form the final product.

The Trust recognises that the paint system (including pre-treatment, primer, backer and topcoat) must be treated as a system due to the potential for environmental impact burden shifting between the elements of the painting process. An example of burden shifting could be if a primer or backer were introduced which requires an increase in the amount of passivant required in order to provide the same level of protection to the strip and deliver the same level of durability in the final product. Equally, the introduction of an environmentally preferable paint which results in a change to the durability and quality of the final product: the environmental impacts of replacing a metal product would far outweigh the reduced environmental impact of the paint system.

Where there is no burden shifting, or impact on the overall quality or durability of the final product, The Trust recognises that generally water-borne paints are preferable to solvent-borne paints, particularly with regards to their use of:

- Ecotoxins (including naphthalene and trimethylbenzene)
- Carcinogens, mutagens and reproductive toxins
- Hydrocarbon solvents and aromatic hydrocarbon solvents
- Volatile organic compounds (~600 - 850 g/litre wet paint).

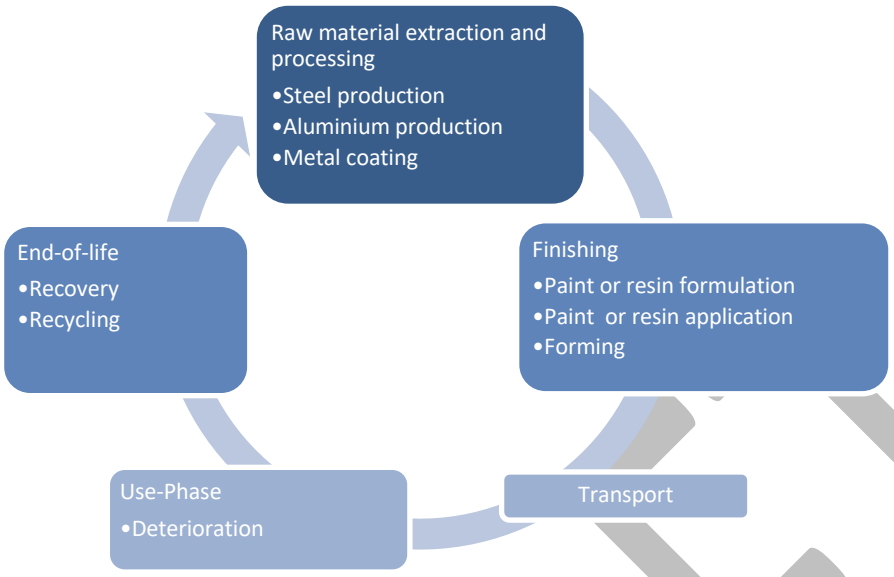
Comparatively, water-borne paints are safer to handle and transport and have significantly reduced levels of VOCs (~150 g/litre wet paint), although they do require additives to improve water solubility of the paint, which may be toxic. Afterburners are commonly required to control process emissions of VOCs. If VOC levels in the paint system can be sufficiently decreased, such control equipment may not be required, resulting in reduced energy use and greenhouse gas emissions.

The Trust supports the transition to hexavalent chromium/chromate-free and fully water-borne paint systems. This specification seeks to recognise companies who are proactively researching and testing options to create fully-water-borne paint solutions and transition to chromate-free pre-treatment.

Rollforming or pressing to create the finished product is also included in the scope of this specification, to allow final, consumer-facing, products to be licensed.

As with all ECA specification development work, a lifecycle approach has been used to identify and understand the material issues associated with painting, coating, and forming flat metal products, and to use these as points by which environmentally preferable products can be differentiated (see Figure 1).

Figure 1: Key impacts addressed across each stage of the product lifecycle



The impacts associated with the production of metal coated feedstock are included in the scope of this specification, based on the criteria established in EC-41 Flat and Long Steel Products or EC-62 for Aluminium building products.

Within the painting or coating application process the following aspects are considered differentiating on the basis of environmental performance:

- Chemicals used in the pre-treatment, primer, backer, topcoat and resin, in particular solvent-based primers and backers and chromate-free passivants
- Energy used in coating ovens
- Discharges to air from the coating ovens
- Waste liquids (paint and chemicals).

In addition, the energy used and waste generated during finishing processes are also considered, as is transport of the finished product from the rollformer or fabricator to site or a retailer.

There have been concerns raised, particularly in the Auckland Region, regarding the potential for contaminated roof runoff from deteriorating metal roofs when in use. These potential impacts are best addressed by this specification in the coating / painting phase by assuring quality paints or coatings are applied to protect the metal coated surface from deterioration.

One of the most significant ways that the lifecycle impacts of metal products can be reduced is by recycling the metal products at the end of their useful life. Some coatings can result in a product not being recyclable at the end of its useful life, and such coatings are therefore excluded from this specification.

3 INTERPRETATION

Energy Management Programme means a programme to achieve and sustain efficient and effective use of energy including policies, practices, planning activities, responsibilities and resources that affect the organisation's performance for achieving the objectives and targets of the Energy Policy.

Environmentally hazardous material means any material, chemical or other substance that if released into the natural environment will threaten environmental health.

GEN means the Global Ecolabelling Network.

GHS Category means a hazard category based on the Globally Harmonised System of Classification and Labelling of Chemicals

ISO means International Organization for Standardization.

Label means the Eco Choice Aotearoa Label.

Mitigation hierarchy means a step-by-step tool used to limit the negative biodiversity impacts of development projects. The mitigation hierarchy consists of four steps: – avoid, minimise, then restore impacted areas and finally offset any impacts that remain. When applying the hierarchy, the best-practice goal is to achieve no net loss or, whenever possible, a net gain[1].

Metallic-Coated means steel (roll or coil) which has a thin layer of zinc deposited on its surface, through a hot-dip or electrolytic process, for the purpose of increasing the steel's corrosion resistance. For the purpose of this document, metallic-coated also includes treatments with zinc-iron, zinc-aluminium, zinc-aluminium-magnesium or other similar zinc-based mixtures.

HSNO Class means a particular hazard classification as defined in the New Zealand Hazardous Substances and New Organisms Act 1996 and associated Regulations

Volatile Organic Compound or VOC means any organic compound which has a vapour pressure more than 0.1 mm Hg at 25°C. Organic compounds with a boiling point greater than 250°C, measured at a standard pressure of 101.3 kPa, will not be considered to be a VOC.

Where references are made in this document to published lists, standards, or documents, the reference should be read as referring to the most recent edition of these lists, standards or documents.

4 CATEGORY DEFINITION

This category includes:

- Metal roofing products which are painted or coated prior to or as part of rollforming or pressing processes.
- Flat metal products which:
  - Are manufactured from metallic-coated metal coil or otherwise surface treated to prevent surface corrosion
  - Can be pressed or rollformed to create a final product
  - Are painted, or coated with a resin, prior-to or as part of the rollforming or pressing process.

  The category does not include flat metal products that have been painted after rollforming or assembly (e.g., industrial coatings).

For the avoidance of doubt, products covered by this specification include painted or coated metallic-coated steel coil, metal products for roofing, fencing, framing, guttering, and cladding, and metal skin sandwich panels made from streel or aluminium, with a core of insulation material.

The category does not include spray painted or powder coated furniture or fittings products. Those products could be licensed under EC-32 if they meet the category definition and other requirements of that specification.

[1] *Guidance on Good Practice Biodiversity Offsetting in New Zealand,* Ministry for the Environment and Department of Conservation (2014)

To be licensed to use the ECA Label, the pre-painted or resin-coated metal product must meet all the relevant environmental criteria set out in clause 5 and all of the product characteristics set out in clause 6.

5 ENVIRONMENTAL CRITERIA

5.1 Legal requirements

Criteria

~~The product must comply with the provisions of all relevant environmental laws and regulations that are applicable during the product's lifecycle.~~

a. The product must comply with the provisions of all relevant environmental laws and regulations that are applicable during the product's life cycle.
b. Materials or processes involved in the production of a pre-painted and resin-coated metal products may not be under the direct control of a licence applicant/holder. Where this is the case, the licence applicant/holder must have and implement a formal supplier regulatory compliance management/assurance programme that:
    - Includes documented requirements for suppliers to provide raw materials or services compliant with applicable environmental regulatory requirements (for example in supply contract conditions).
    - Identifies suppliers, materials or processes that involve, or would be expected to be subject to a high level of regulatory control and/or which present a high potential risk of regulatory non-compliance.
    - Includes appropriate requirements (based on the risk assessment) for suppliers to provide assurance to the licence applicant/holder on the supplier's environmental regulatory compliance.

Verification required

Conformance with this requirement shall be demonstrated by providing a written statement on regulatory compliance, signed by the Chief Executive Officer or other authorised representative of the applicant company. This statement shall be supported by documentation identifying the applicable regulatory requirements and demonstrating how compliance is monitored and maintained.

Explanatory notes

Relevant laws and regulations applicable to the facilities that are manufacturing the ECA-licensed product and the Licence holder's distribution and sales operations, could, for example, include those that relate to:

- Producing, sourcing, transporting, handling and storing raw materials and components for manufacture
- Manufacturing processes
- Handling, transporting and disposing of waste products arising from manufacturing
- Transporting product within and between countries
- Using and disposing of the product.

The documentation required may include, as appropriate:

- Procedures for approving and monitoring suppliers and supplies
- Information provided to customers and contractors regarding regulatory requirements.
- Evidence of a formal certified environmental management system (for example an ISO 14001 certificate) and supporting records on regulatory compliance (for example, copies of regulatory requirements registers, procedures to manage regulatory compliance, monitoring and evaluation

reports on regulatory compliance, internal or external audits covering regulatory compliance and management review records covering regulatory compliance)

- Copies of published environmental, sustainability and/or annual reports expressly addressing environmental regulatory compliance (for example verified environmental statements prepared under the European EMAS regulations)
- Audit reports completed by independent and competent auditors addressing regulatory compliance (for example, reports for other eco-label licences or reports from regulator audits)
- Participation by the supplier in the licence applicants/holders own supplier audit programme.

It is not intended to require licence holders to accept increased legal responsibility or liability for actions that are outside their control. The Trust's intention is to ensure any potential for environmental regulatory non-compliance associated with an ECA labelled product is managed to a level that minimises risk of reputation damage to the ECA label and programme.

Notes:

The Trust has updated the language of this clause to bring this specification in line with other, recently revised, ECA specifications.

5.2 Environmental management system or processes

The applicant / licence holder or manufacturer must have (or establish, if necessary) appropriate environmental management processes or an environmental management system (EMS), to manage the environmental impacts from the manufacturing of the product.

Verification required

Conformance with this requirement shall be demonstrated by providing a written statement on compliance, signed by the Chief Executive Officer or other authorised representative of the applicant / licence holder or manufacturer. The statement shall be supported by an EMS based on ISO 14001, or details of the processes for controlling hazardous substances, discharges to air, land and water or other relevant environmental impacts.

Notes:

The Trust has introduced this clause to bring this specification in line with other, recently revised, ECA specifications.

5.3 Modern slavery and social accountability

Criteria

~~a The applicant/licence holder must have a policy/policies on human rights, diversity & inclusion, and anti-bullying. At a minimum, it should comprise:~~

- ~~An explicit commitment to respect all internationally recognized human rights standards in the United Nations International Bill of Human Rights and the International Labour Organization (ILO) Declaration on the Fundamental Principles and Rights at Work (see Appendix A);~~
- ~~Stipulations concerning the company's expectations of personnel, business partners and other relevant parties e.g. a code of conduct; and~~

- ~~Information on how the company will implement its commitments and monitor compliance with it.~~

~~In addition to the above, the applicant/licence holder shall consider:~~

- ~~implementing the requirements of Social Accountability International Standard, SA8000.~~
- ~~Being a Living Wage employer (or equivalent).~~
- ~~Having a senior member of its organisation responsible for social and environmental sustainability.~~

~~b Where an applicant/licence holder has found instances of modern slavery in their business operations and or supply chains in the past two years, they must provide evidence of corrective action.~~

~~Verification required~~

~~Conformance with these requirements shall be stated in writing and signed by the Chief Executive Officer or other authorised representative of the applicant/licence holder company. This statement shall be supported by:~~

- ~~Copies of the relevant policies, procedures and plans.~~
- ~~Records demonstrating the plans are being effectively implemented (including monitoring results).~~

~~Explanatory notes~~

~~Information on the United Nations International Bill of Human Rights and the ILO Declaration on the Fundamental Principles and Rights at Work is provided in Appendix A.~~

a. The applicant / licence holder and manufacturer must have a publicly available policy / policies on human rights, diversity & inclusion, and anti-bullying. At a minimum, it should comprise:
   - An explicit, commitment to respect all internationally recognized human rights standards – understood, at a minimum, as the International Bill of Rights and the International Labour Organization (ILO) Declaration on the Fundamental Principles (see below) and Rights at Work;
   - Stipulations concerning the company's expectations of personnel, business partners and other relevant parties e.g. a code of conduct; and
   - Information on how the company will implement its commitment and monitor compliance with it.

b. **Note:** The Trust expects the applicant / licence holder and manufacturer to show that it is undertaking activities to create more equitable conditions for those affected by, or involved in, the sourcing and manufacturing of products and materials, supported by a publicly available document.

c. Where an applicant / licence holder and manufacturer has found instances of modern slavery in their business operations and or supply chains* in the past two years, there shall be evidence of corrective action.

d. In addition to the above, the applicant / licence holder and manufacturer shall consider:
   - Providing information to confirm whether the requirements of Social Accountability International Standard, SA8000 have been considered;
   - Being a Living Wage employer (or equivalent); and
   - Having a senior member of its organisation responsible for social and environmental sustainability.

e. Note: From ILO Declaration on the Fundamental Principles and Rights at Work, there are the following core labour standards:
   - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87);
   - Right to Organise and Collective Bargaining Convention, 1949 (No. 98);

- Forced Labour Convention, 1930 (No. 29);
- Abolition of Forced Labour Convention, 1957 (No. 105);
- Minimum Age Convention, 1973 (No. 138);
- Worst Forms of Child Labour Convention, 1999 (No. 182);
- Equal Remuneration Convention, 1951 (No. 100); and
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111).

*Supply chains refer to the products and services (including labour) that contribute to the ECA-licensed products and services. This includes products and services sourced in NZ or overseas and extends beyond direct suppliers.

Verification required

Conformance with this requirement shall be stated in writing and signed by the Chief Executive Officer or other authorised representative of the applicant/licence holder. This statement shall be accompanied by documentation that:

- Copies of the relevant policies, procedures and plans; and
- Records demonstrating the plans are being effectively implemented (including monitoring results).

Explanatory notes

Information on the United Nations International Bill of Human Rights and the ILO Declaration on the Fundamental Principles and Rights at Work is provided in Appendix A

Notes:

The Trust has introduced this clause to bring this specification in line with other, recently revised, ECA specifications.

5.4 Feedstock and components

Criteria

a. Metal feedstock must meet the ECA requirements for metal products in either EC-41 Flat and Long Steel Products or EC-62 Aluminium Building Products.
b. At least 85 % of the components in the product must be covered by part (a) above.
c. The core in sandwich panel products must meet the relevant requirements for raw materials, hazardous substances, and product stewardship in EC-25 Building Insulants.

Verification required

Conformance with this requirement shall be stated in writing and signed by the Chief Executive Officer or other authorised representative of the applicant company. The statement shall be supported by a copy of the ECA certificate or an assessment report demonstrating compliance for the components used.

5.5 Passivation, conversion coating and anodising

Criteria

From December 2024, metal products may not be passivated, conversion coated or anodised with solutions containing hexavalent chromium (Cr(VI)/chrome 6+).

Verification required

Conformance with these requirements shall be demonstrated by providing a written statement on compliance, signed by the Chief Executive Officer or other authorised representative of the applicant company. The statement shall be supported by documentation that includes:

- Information, including Safety Data Sheets (SDS), for all substances used during passivation, conversion coating or anodising of the metal.

5.6 Paint system

5.6.1 Water-borne paints

Criteria

a Water-borne paints used in the paint system must meet all the requirements to be classified as non-hazardous or approved under the Surface Coatings and Colourants (Subsidiary Hazard) Group Standard 2017 under HSNO (or equivalent standard).

b Water-borne paints used in the paint system must not be formulated with:

- compounds that contain mercury, lead, cadmium, arsenic, or their compounds.
- more than 3.5% by weight of the formulated paint, of substances classified as acutely toxic (fatal or toxic) to human health (NZ HSNO Classes 6.1B or 6.1C).
- VOC levels of more than 170 g/litre wet paint.

c Water-borne paints used in the paint system must not be formulated with substances classified as:

- Ecotoxic
  - HSNO Classes 9.1A, 9.1B
  - GHS Category 1 (Very toxic to aquatic life (Acute) and Very toxic to aquatic life with long-lasting effects (Chronic)), H400 and H410
  - GHS Category 2 (Very toxic to aquatic life with long-lasting effects (Chronic)), H411
- Carcinogens
  - HSNO Class 6.7A
  - GHS Category 1a and 1b ('known or presumed human carcinogens'), H350
- Reproductive toxins
  - HSNO Class 6.8A
  - GHS Category 1a and 1b (‘known or presumed human reproductive toxicant’), H360
- Mutagens
  - HSNO Class 6.6A
  - GHS Category 1a and 1b (‘known or presumed to induce heritable mutations in germ cells of humans’), H340

d Any paint used on the outermost layer on both the top- and bottom-side of the product must not be formulated with hexavalent chromium.

e A publicly available document (example: safety data sheet or technical data sheet) which discloses all hazardous substances and chemicals of concern in accordance with the Globally Harmonized System(GHS).

Verification required

Conformance with these requirements shall be demonstrated by providing a written statement of compliance, signed by the Chief Executive Officer or other authorised representative of the applicant company. The statement shall be supported by Safety Data Sheets or documentation from the paint manufacturer confirming for the paint formulation(s) used for licensed product(s):

- The paint hazard has been assessed and has been shown to be non-hazardous or within the scope of the Subsidiary Hazard Group Standard
- VOC levels (g/litre wet paint)
- Proportion (as a percentage) of chemicals classed as acutely toxic (fatal or toxic)
- Paints are not formulated with substances with the classifications listed in clause 5.5.1(c)
- The paint is not formulated with hexavalent chromium if it is used as the outermost layer of either the top- and bottom-side of the product.
- a publicly available Safety Data Sheet (SDS) or Technical Data Sheet (TDS) may meet the requirements, provided it lists all hazardous substances in the product and other information to confirm that the requirements a-c are met. Hazardous substances should be identified in accordance with the New Zealand Health & Safety at Work Act and Hazardous Substances and New Organisms Act, or local equivalent legislation in the country where the product is manufactured. SDS for products sold in New Zealand must meet New Zealand legislative requirements. Hazardous substance classifications should be in accordance with the Globally Harmonised System (GHS).

5.6.2 Solvent-borne paints

Criteria

a Solvent-borne paints must not have:

- VOC levels of more than 600 g/litre wet paint.

b The licensee must report the percentage by weight of the formulated paint of substances that are classified as:

- Carcinogens
  - HSNO Class 6.7A
  - GHS Category 1a and 1b ('known or presumed human carcinogens'), H350
- Ecotoxic
  - HSNO Classes 9.1B, 9.1C
  - GHS Category 1 (Very toxic to aquatic life with long-lasting effects (Chronic)), H411
  - GHS Category 2 (Harmful to aquatic life with long-lasting effects (Chronic)), H412

c Solvent-borne paints must not be formulated with:

- compounds containing mercury, lead, cadmium, arsenic, or their compounds
- substances classified as ecotoxic
  - HSNO Class 9.1A
  - GHS Category 1 (Very toxic to aquatic life (Acute)), H400
- substances classified as mutagens
  - HSNO Class 6.6A
  - GHS Category 1a and 1b (‘known or presumed to induce heritable mutations in germ cells of humans’), H340
- substances classified as reproductive or developmental toxicants
  - HSNO Class 6.8A
  - GHS Category 1a and 1b (‘known or presumed human reproductive toxicant’), H360

d Any paint used on the outermost layer on both the top- and bottom-side of the product must not be formulated with hexavalent chromium.

e The licence holder must have a proactive approach to developing a fully water-borne paint system which does not shift the environmental impact of strip or tile protection to another part of the painting or coating process or product lifecycle. This may include, but is not limited to:

- an in-house research and testing programme
- participating in international research and testing
- partnering with other members of the supply chain to research and test alternative paint system options with reduced environmental impact.

Within the first three years of implementing processes in accordance with Clause 5.5.2 e), the Trust expects licence holders to demonstrate that they are making good progress towards transitioning from solvent-borne paints to water-borne paints which meet the requirements of clause 5.5.1.

f Licence holders must report annually to The Trust on research and testing under part a), including:

- the percentage (by volume of paint used) of water-borne topcoat, primer and backer used in ECA-licensed products in the past 12 months.
- a summary of the outcomes of any research or testing undertaken into alternative paint systems to further reduce the environmental impact of the system.
- a proposed programme for future research and testing into alternatives, including timeframes.

g A publicly available document (example: safety data sheet or technical data sheet) which discloses all hazardous substances and chemicals of concern in accordance with the Globally Harmonized System(GHS).

Notes:

The Trust has introduced this clause to bring this specification in line with other, recently revised, ECA specifications.

Verification required

Conformance with these requirements shall be demonstrated by providing a written statement of compliance, signed by the Chief Executive Officer or other authorised representative of the applicant company. The statement shall be supported by documentation:

- Confirming the VOC levels (g/litre wet paint), e.g. Safety Data Sheets.
- Showing proportion (as a percentage) of chemicals classed as very ecotoxic or ecotoxic in the aquatic environment.
- Showing proportion (as a percentage) of chemicals classed as known or presumed carcinogens.
- Confirming the paint is not formulated with ingredients with the classifications listed in clause 5.5.2(c).
- Confirming the paints is not formulated with hexavalent chromium if it is used as the outermost layer on either the top- and bottom-side of the metal product.
- A description of the approach being taken to transition to water-borne paints.
- An annual report to The Trust on the research and/or testing undertaken into the use of water-borne paint systems including:
  - the percentage (by volume) of solvent borne topcoat, primer and backer used in ECA-licensed products in the past 12 months
  - evidence that the research has been reviewed and discussed by senior management on a regular basis (at least annually)

- evidence that the research takes into the account the possibility of burden shifting and includes this in the implementation evaluation
- current barriers to the implementation of a fully water-borne paint system
- next steps for additional research / testing

- Timeframes for transition to a fully water-borne solution (noting that these may be staged based and amended year-on-year based on research results).
- a publicly available Safety Data Sheet (SDS) or Technical Data Sheet (TDS) may meet the requirements, provided it lists all hazardous substances in the product and other information to confirm that the requirements a-c are met. Hazardous substances should be identified in accordance with the New Zealand Health & Safety at Work Act and Hazardous Substances and New Organisms Act, or local equivalent legislation in the country where the product is manufactured. SDS for products sold in New Zealand must meet New Zealand legislative requirements. Hazardous substance classifications should be in accordance with the Globally Harmonised System (GHS).

Notes:

The Trust has introduced this clause to bring this specification in line with other, recently revised, ECA specifications.

5.6.3 Aggregate

The following criteria apply to aggregate added to the surface of a pre-painted metal product as part of the painting and finishing process.

5.6.3.1 Quarried aggregate and biodiversity

Criteria

Quarries from which aggregates are obtained for inclusion in the finished surface of a licensed pre-painted metal product must have and implement:

a Management plans including policies and procedures to minimise adverse effects from the following potential impacts:
- noise
- vibration
- dust
- discharges to surface water, groundwater, oceans or land.

b A biodiversity management plan that includes:
- Assessing the risk and materiality of the impacts on biodiversity from the land use and activities on the mining site.
- Consultation with relevant local groups (i.e. indigenous communities).
- Addressing impacts in accordance with the mitigation hierarchy.
- Implementing measures to prevent accidental or deliberate introduction of non-native species that could have significant adverse impacts on biodiversity.
- A quarry restoration plan for when the site is no longer operational.
- Information on how the biodiversity outcomes is shared with stakeholders, made publicly available, periodically reviewed, and updated where necessary.

c When used as part of the product system, natural aggregates must not be additionally coloured or coated in advance of inclusion in the product system.

Verification required

Conformance with these requirements shall be stated in writing and signed by the Chief Executive or authorised representative of the aggregate supplier and countersigned by the Chief Executive or authorised representative of the applicant company. This statement shall be supported by documentation, including:

- Copies of the relevant quarry management plans
- Records demonstrating the management plans are being effectively implemented (including monitoring results). For b) this could include actions with time-bound targets to address material impacts and monitor effectiveness of the actions.
- Confirmation that natural aggregates are not coloured or coated prior to inclusion in the product system.

5.6.3.2 Recycled aggregate alternatives

Criteria

a The paintline / coatingline operator must develop and implement effective policies and procedures and / or a programme to:
  - identify opportunities for using recycled aggregate in place of virgin aggregate.
  - consider the lifecycle implications of transitioning to recycled aggregate, including the impact of any additional processing or coating required to make the aggregate fit-for-purpose.
  - regularly review the business case for sourcing aggregates with lower embodied environmental impact.

b The Licence Holder must annually report to The Trust on its policies, procedures, and programme for the implementation of these.

Verification required

Conformance with this requirement shall be stated in writing and signed by the Chief Executive Officer or other authorised representative of the paintline / coatingline operator and countersigned by the applicant company (if these are different entities). This statement shall be accompanied by documentation that:

- Describes the management policies, procedures and / or plan
- Describes the opportunities for using recycled aggregate investigated and implemented in the previous year (where applicable) including:
  - percentage of recycled aggregate used in specific product / batches (reported as m^2 or product).
  - source of any recycled aggregate used.
  - results of any chemical analysis for contaminants undertaken on any recycled aggregate used or determined to be inappropriate.
  - results of any analysis regarding the lifecycle benefits or improvements of the recycled aggregate versus natural aggregate. This should include calculations or evidence to confirm that the processing required to make recycled aggregates fit-for-purpose does not negate the environmental benefits of their use when compared to virgin material.
  - updated evaluation of current barriers to the use of recycled aggregates
  - evidence that the results of the programme have been reviewed and discussed by senior management on a regular basis (at least annually).

5.7 Resin coating

The following criteria apply to products which are coated with an acrylic resin versus being painted.

Criteria

a. Resins used to coat metallic-coated products must not be formulated with chemicals classified as:

- Ecotoxic
  - HSNO Classes 9.1A, 9.1B
  - GHS Category 1 (Very toxic to aquatic life (Acute) and Very toxic to aquatic life with long-lasting effects (Chronic)), H400 and H410
  - GHS Category 2 (Very toxic to aquatic life with long-lasting effects (Chronic)), H411
- Carcinogens
  - HSNO Class 6.7A
  - GHS Category 1a and 1b ('known or presumed human carcinogens'), H350
- Reproductive toxins
  - HSNO Class 6.8A
  - GHS Category 1a and 1b ('known or presumed human reproductive toxicant'), H360
- Mutagens
  - HSNO Class 6.6A
  - GHS Category 1a and 1b ('known or presumed to induce heritable mutations in germ cells of humans'), H340

b. A publicly available document (example: safety data sheet or technical data sheet) which discloses all hazardous substances and chemicals of concern in accordance with the Globally Harmonized System(GHS).

Verification required

Conformance with these requirements shall be demonstrated by providing a written statement on compliance, signed by the Chief Executive Officer or other authorised representative of the applicant company. The statement shall be supported by Safety Data Sheets or documentation from the resin manufacturer confirming that the resin(s) used on the licensed product(s) are not formulated with the substances listed in clause 5.6.

- a publicly available Safety Data Sheet (SDS) or Technical Data Sheet (TDS) may meet the requirements, provided it lists all hazardous substances in the product and other information to confirm that the requirements in (a) are met. Hazardous substances should be identified in accordance with the New Zealand Health & Safety at Work Act and Hazardous Substances and New Organisms Act, or local equivalent legislation in the country where the product is manufactured. SDS for products sold in New Zealand must meet New Zealand legislative requirements. Hazardous substance classifications should be in accordance with the Globally Harmonised System (GHS).

Notes:

The Trust has introduced this clause to bring this specification in line with other, recently revised, ECA specifications.

5.8 Paintline or coating operations

The following criteria and verification requirements apply to the manufacturing lines and sites where metal coil or strip is painted, or resin coated.

The Trust recognises that efficiencies may change based on the size and nature of manufacturing sites, and therefore, where performance reporting is required, request that this is done on an absolute basis (i.e., total energy used and total m^2 of product processed per annum). This may be prorated to reflect licensed product volumes.

5.8.1 Energy management and embodied carbon

The paintline / coatingline operator must have an energy management policy, procedures and / or management plan in place to monitor energy use from the paintline or coatingline, and actively explore ways to reduce energy demand. The policy, procedures and / or plan may cover the paintline only or extend facility- or company-wide.

If rollforming or pressing are integrated into the painting or coating operations (i.e. undertaken within the same facility), these processes may be covered by this policy, procedures and / or plan, or reported separately as per the requirements of clause 5.7.1.

Criteria

a The paintline / coatingline operator must develop and implement effective energy management policies and procedures and / or an energy management programme to:

- monitor energy use (kWh, or equivalent) and CO_2 (per m^2 or tonne of product produced) i.e. the embodied energy and embodied carbon in the product. This could initial include scope 1 & 2 emissions and transport to and from the paintline / coatingline operator, but should expand to include scope 3 emissions in future years.
- investigate any changes to energy efficiency on the line.
- identify opportunities for energy efficiency improvements, particularly with regards to the operation of coaters and ovens.
- regularly review the business case for implementing energy efficiency measures.

b The Licence Holder must annually report to The Trust on the programme and its implementation.

c Licence holders must have improvement objectives and targets for reduction of energy use related to production of ECA-licensed products, and associated GHG, ~~over time~~ year on year. Furthermore, licence holders must publicly disclose a commitment to decarbonise between now and 2050 on a 1.5°C trajectory, with a 30 % reduction in scope 1 and 2 emissions by 2030. Any divergence from objectives or targets should be explained in the annual report.

Verification required

Conformance with this requirement shall be stated in writing and signed by the Chief Executive Officer or other authorised representative of the paintline / coatingline operator and countersigned by the applicant company (if these are difference entities). This statement shall be accompanied by documentation from the paintline / coatingline operator which:

- Describes the energy management policies, procedures and / or plan.
- Evidences that opportunities for energy efficiency improvement have been reviewed and discussed by senior management on a regular basis (at least annually).
- Describes the energy management programmes investigated and implemented in the previous year (where applicable).
- Describes barriers to the implementation of energy efficiency initiatives (where applicable).
- Includes a report on annual energy use by fuel type and CO_2 emission per total m^2 of product painted / coated (noting that this may be prorated to licensed product volumes where appropriate).

- Details of performance against improvement objectives and targets relating to the reduction of energy use related to production of ECA-licensed products, and associated GHG emissions, ~~over time~~ year on year.
- confirms the licence holder has publicly committed to decarbonise between now and 2050 on a 1.5°C trajectory, with incremental reduction up to 2030 (any divergence from objectives or targets should be explained in the annual report)

Notes:

The Trust has introduced this clause to bring this specification in line with other, recently revised, ECA specifications.

5.8.2 Material efficiency

The paintline / coatingline operator must have systems and processes in place to monitor and improve material efficiency to ensure that waste of key material inputs is minimised within the process.

Criteria

a The paintline / coatingline operator must develop and implement an effective material efficiency monitoring programme which will cover (at a minimum):
   - paint or resin use
   - aggregate use (where applicable)
   - metal use
   - the volume and recyclability of packaging used for transport of product from the manufacturer (e.g. steel strap, protective film)
   - policies and procedures to:
     - monitor material efficiency
     - investigate any changes to material efficiency on the line
     - identify opportunities for material efficiency improvements
     - regularly review the business case for implementing material efficiency measures.

b The Licence Holder must annually report to The Trust on the programme and its implementation.

Verification required

Conformance with this requirement shall be stated in writing and signed by the Chief Executive Officer or other authorised representative of the paintline / coatingline operator and countersigned by the applicant company (if these are difference entities). This statement shall be accompanied by documentation that:

- Describes the material efficiency management policies, procedures and / or plan
- Evidences that opportunities for improved material efficiency improvement have been reviewed and discussed by senior management on a regular basis (at least annually)
- Describes the material efficiency programmes investigated and implemented in the previous year (where applicable), noting that this may be prorated to licensed product volumes where appropriate
- Describes barriers to the implementation of material efficiency initiatives (where applicable)
- Includes a report on annual material efficiency as a percentage total of inputs versus outputs.

Explanatory notes

Material efficiency is to be calculated as the total mass of saleable product(s) produced by the painting or coating process divided by the total inputs (by mass) to the painting or coating process. This should be

calculated for ECA licensed product only, and may be calculated pro rata from site-wide data. All key raw materials used in the painting or coating process should be included (where applicable):

- Metal
- Primer and pre-treatments
- Paints
- Resins
- Aggregates
- Solvents and cleaning chemicals
- Oils and lubricants.

5.8.3 Emissions to air

Emissions to air from the paintline or coatingline must be monitored, and options to reduce emissions must be evaluated.

Criteria

a Discharges to air of particulates (PM_{10}) and VOCs from the paintline or coating process shall be demonstrated to result in an acceptable and environmentally sustainable level of impact on the quality of the receiving environment.

b The paintline / coatingline operator must develop and implement effective emissions management policies and procedures and / or an emissions management programme to:

- track and evaluate emissions of particulates (PM_{10}) and VOCs per m^2 of strip painted or coated
- investigate any changes to emissions in a timely manner
- identify opportunities for point source emissions improvements, particularly with regards to operation of coaters and ovens
- regularly review the business case for implementing air quality improvement measures.

c The Licence Holder must annually report to The Trust on the air quality improvement programme and its implementation.

Verification required

Conformance with this requirement shall be stated in writing and signed by the Chief Executive Officer or other authorised representative of the applicant company. This statement shall be accompanied by documentation from the paintline or coatingline operator that:

- Provides an assessment of discharges to air identified in (a) and impact on the receiving environment completed by a person or agency competent to complete such an assessment (an assessment of environmental effects and other supporting information lodged in support of a resource consent application would be deemed to meet this criterion)
- Describes the emissions management policies, procedures and / or plan
- Describes any corrective actions undertaken in the previous year to operate within consented operational limits
- Includes a copy of the paintline or coatingline's preventative maintenance plan for all air emission control equipment
- Describes the emissions reductions programmes investigated and implemented in the previous year (where applicable)
- Evidences that opportunities to reduce emissions have been reviewed and discussed by senior management on a regular basis (at least annually)
- Describes barriers to the implementation of air emissions reduction opportunities

- Includes a report to the Trust on particulates (PM_{10}) and VOCs in the context of total m^2 of product painted / coated.

5.8.4 Effluent management and water use

The paintline or coatingline operator must have systems and processes in place to monitor the quality of discharges of effluent and manage sludge and slushing oil, and to evaluate opportunities to improve effluent quality, reuse sludge and reduce potable water use.

Criteria

a Discharges to sewer or the environment from the paintline or coating processes (including process water, cooling water and stormwater) shall be demonstrated to result in an acceptable and environmentally sustainable level of impact on the quality of the receiving environment.

b The paintline or coatingline operator must report on how waste sludge, oil or sediment is reused, or demonstrate that these are disposed of to an appropriate location.

c The paintline / coatingline operator must develop and implement effective effluent management policies and procedures and / or an effluent management programme to:

- monitor the quality of discharges to sewer or the environment from the paintline or coatingline, or from any associated wastewater treatment plant.
- investigate any changes to discharge quality in a timely manner.
- identify opportunities to reduce the levels of oil, grease, paint, chemicals or other pollutants which enter the wastewater or stormwater systems.
- identify opportunities to reuse waste sludge, oil or sediment.
- identify opportunities to reuse process water, use recycled water or harvest water onsite to reduce potable water use.
- regularly review the business case for implementing effluent quality improvement, waste sludge, oil or sediment reuse and potable water use reduction initiatives.

d The Licence Holder must annually report to The Trust on its programme and its implementation.

Verification required

Conformance with this requirement shall be demonstrated by providing a written statement of compliance, signed by the Chief Executive Officer or other authorised representative of the Applicant Company. This statement shall be supported by documentation from the paintline or coatingline operator that:

- For discharges identified in (a), an independent assessment of the discharge quality and its impact on the receiving environment completed by a person or agency competent to complete such an assessment. The assessment should be based on the quality of discharge at the point at which it exits the site and enters any combined or municipal waste collection and treatment system, or discharges to the natural environment.
- Describes effluent, oil and sludge management policies, procedures and / or plan.
- Includes a summary of annual monitoring results of discharges to sewer.
- Describes any corrective actions undertaken in the previous year to operate within consented operational discharge limits.
- Confirms that any sludge, oil or sediment removed from treated effluent were reused or disposed of in an appropriate manner.
- Includes a copy of the paintline or coatingline's preventative maintenance plan for all effluent, oil, waste water or sediment control equipment / processes.
- Describes the effluent quality improvement initiatives investigated and implemented in the previous year (where applicable) and current barriers to implementation (where applicable)

- Describes the sludge, oil or sediment reuse initiatives investigated and implemented in the previous year (where applicable) and current barriers to implementation (where applicable)
- Describes initiatives investigated and implemented in the previous year (where applicable) to minimise potable water use and current barriers to implementation (where applicable)
- Evidence that opportunities have been reviewed and discussed by senior management on a regular basis (at least annually).

5.9 Rollforming or pressing

The following criteria apply to all products which are rollformed or pressed to form the final licensed product. The criteria do not apply if the product to be licensed is painted coil which has not been pressed or rollformed.

The Trust recognises that efficiencies may change based on the size and nature of manufacturing sites, and therefore, where performance reporting is required, request that this is done in the context of total energy used and total volume of strip processed (m^2), to allow evaluation of energy per m^2. This may be prorated to licensed product volumes where appropriate.

5.9.1 Energy management and embodied carbon

The finisher must have a plan in place to monitor energy use from the rollforming or pressing plant, and to actively explore ways to reduce energy demand. The policy, procedures and / or plan may cover the rollforming / pressing facilities only, or extend site- or company-wide.

If rollforming or pressing are integrated into the painting or coating operations (i.e. undertaken within the same facility), these processes may be covered by the policy, procedures and/or plan, or reported as per the requirements of clause 5.7.1.

Criteria

a The finisher must develop and implement effective energy management policies and procedures and / or an energy management programme to:

- Total energy use;
- Breakdown of total energy use to types of energy used (electrical, chemical, fuel, etc) including energy from renewable sources;
- monitor energy use (kWh, or equivalent) and CO_2 (per m^2 or tonne of product produced) i.e. the embodied energy and embodied carbon in the product. This could initial include scope 1 & 2 emissions and transport to and from the rollforming/pressing facilities, but should expand to include scope 3 emissions in future years.
- investigate any changes to energy efficiency across the site
- identify opportunities for energy efficiency improvements
- regularly review the business case for implementing energy efficiency measures.

b The Licence Holder must report annually to The Trust on the programme and its implementation.

c Licence holders must have improvement objectives and targets for reduction of energy use related to production of ECA-licensed products, and associated GHG, ~~over time~~ year on year. Furthermore, licence holders must publicly disclose a commitment to decarbonise between now and 2050 on a 1.5°C trajectory, with a significant reduction prior to 2030. Any divergence from objectives or targets should be explained in the annual report.

Notes:

The Trust has introduced this clause to bring this specification in line with other, recently revised, ECA specifications.

Verification required

Conformance with this requirement shall be stated in writing and signed by the Chief Executive Officer or other authorised representative of the applicant company. This statement shall be accompanied by documentation from the finisher that:

- Describes the energy management policies, procedures and / or plan.
- Describes the energy management programmes investigated and implemented in the previous year (where applicable) and barriers to implementation (where applicable).
- Evidences that opportunities to improve energy efficiency have been reviewed and discussed by senior management on a regular basis (at least annually) .
- Includes a report on annual energy use by fuel type in the context of total m^2 rollformed or pressed into final product (noting that this may be prorated to licensed product volumes where appropriate).
- Details of performance against improvement objectives and targets relating to the reduction of energy use related to production of ECA-licensed products, and associated GHG emissions, ~~over time~~ year on year.
- confirms the licence holder has publicly committed to decarbonise between now and 2050 on a 1.5°C trajectory, with incremental reduction up to 2030 (any divergence from objectives or targets should be explained in the annual report).

Notes:

The Trust has introduced this clause to bring this specification in line with other, recently revised, ECA specifications.

5.9.2 Transport

The following criteria apply to finishers who supply finished product to wholesalers, retailers or directly to site.

Criteria

a The finisher must develop and implement a transport management policy which supports the:

- identification of opportunities to consolidate or backfill to minimise the number of truck movements associated with delivering finished product to customers
- promotion of the business case for implementing transport measures that reduce adverse environmental effects.
- Calculate energy use during transport of raw materials (if the licence holder is the manufacturer), or transport of pre-painted and resin-coated metal products are imported from overseas manufacterers (if the licence holder is an importer/supplier)

b The Licence Holder must annually report to The Trust on the programme and its implementation.

Verification required

Conformance with this requirement shall be stated in writing and signed by the Chief Executive Officer or other authorised representative of the applicant company. This statement shall be accompanied by documentation from the finisher that:

- Describes the transport policy.
- Describes the transport programmes investigated and implemented in the previous year (where applicable) and current barriers to implementation (where applicable).

- Provides evidence that opportunities to improve transport efficiency or reduce transport-related carbon emissions have been reviewed and discussed by senior management on a regular basis (at least annually).

Notes:

The Trust has introduced this clause to bring this specification in line with other, recently revised, ECA specifications.

5.10 Storage of hazardous materials and waste management

The following criteria apply to the paintline / coatingline, and the rollforming / pressing operations (where these are included in the lifecycle of the licensed product).

5.10.1 Storage of hazardous materials and waste

Criteria

The paintline or coatingline operator, and rollformer or presser (where rollforming or pressing are included in the lifecycle of the licensed product), must have and implement effective management policies, procedures and systems covering the appropriate storage and handling of environmentally hazardous materials, including raw materials and wastes. These procedures shall:

- Ensure any storage of environmentally hazardous materials is located and managed to prevent contamination of surface water or land, including ensuring potentially hazardous liquids are bunded.
- Include a Spill Response Plan detailing procedures to identify, contain and clean-up any spill of potentially hazardous substances.

Verification Required

Conformance with this requirement shall be demonstrated by providing a written statement of compliance, signed by the Chief Executive Officer or other authorised representative of the Applicant Company. This statement shall be supported by documentation that includes:

- Details, including photographs if appropriate, of the location and type of storage facilities on site and the materials stored in each.
- A copy of the Spill Response Plan and records of test/drills, implementation, and reviews.

5.10.2 Segregation of non-hazardous waste

Criteria

The paintline or coatingline operator, and rollformer or presser (where rollforming or pressing are included in the lifecycle of the licensed product), must have and implement effective management policies, procedures and systems to ensure that waste is segregated to allow maximum levels of recycling. These procedures shall ensure that there are separate, clearly labelled bins in the rubbish area for recyclable materials to be segregated, including, but not limited to bins for:

- scrap for recycling
- cardboard for recycling.

Verification Required

Conformance with this requirement shall be demonstrated by providing a written statement of compliance, signed by the Chief Executive Officer or other authorised representative of the Applicant Company. This statement shall be supported by documentation that includes details, including photographs if appropriate, of the location and type of bins included in rubbish storage areas, including evidence of clear signage.

5.11 Waste Management

Criteria

a. The pre-painted and resin coated metal products product manufacturer must have effective waste management policies and procedures and/or a waste management programme covering manufacturing operations; and

b. Licence holders must report annually to Eco Choice Aotearoa on waste management, including:

- Quantities and types of waste recovered for reuse internally and externally;
- Quantities and types of waste recycled internally and externally;
- Quantities and types of waste disposed of to landfill;
- Information on disposal locations for all wastes; and
- Initiatives taken to reduce waste generation and improve recovery/recycling of waste.

c. Licence holders must have continuous improvement objectives and targets relating to the reduction of waste generation, and the increase of reuse and recycling rates over time. Any divergence from objectives or targets should be explained in the annual report.

Verification Required

Conformance with this requirement shall be stated in writing and signed by the Chief Executive Officer or other authorised representative of the applicant company. This statement shall be accompanied by documentation that:

- Describes the waste management policies, procedures and programmes; and
- Includes annual reports to The Trust on waste generation and management.
- details the improvement objectives and targets relating to the reduction of waste generation and the increase of reuse and recycling rates (any divergence from objectives or targets should be explained in the annual report).

Notes:

The Trust has introduced this clause to bring this specification in line with other, recently revised, ECA specifications.

5.12 Recyclability

The following criteria apply to the paintline / coatingline, and the rollforming / pressing operations (where these are included in the lifecycle of the licensed product).

Criteria

Metal products must not be impregnated, labelled, coated or otherwise treated in a manner which prevents recycling in New Zealand or in the country where the product is used.

Verification Required

Conformance with these requirements shall be stated in writing and signed by the Chief Executive or authorise representative of the applicant company. Relevant test certificates and information sheets shall be supplied for review.

5.13 Product stewardship

Criteria

a The applicant/licence holder must be actively participating in a product stewardship scheme in New Zealand that involves:

- recovery of unwanted or unused product from pre- and post-consumer sources.
- reuse and/or recycling of recovered products.
- promotion of the product stewardship scheme to customers.

Note: the product stewardship scheme may be either an internal or a third-party scheme.

b Licence holders must report annually to ECA on the performance of the product stewardship scheme, including:

- volume of pre-consumer and volume of post-consumer product recovered.
- the % of recovered product that was re-used and the means by which it was reused.
- the % of recovered product that was recycled.
- initiatives taken as part of the programme to increase the volume of recovered product that is reused or recycled.

Verification Required

Conformance with these requirements shall be stated in writing and signed by the Chief Executive or authorise representative of the applicant/licence holder company. This statement shall be accompanied by documentation that:

- Describes the product stewardship scheme; and
- Includes annual reports on the product stewardship scheme.

6 PRODUCT CHARACTERISTICS

Criteria

The product shall be fit for its intended use and conform, as appropriate, to relevant product performance standards including (a), (b), (c) or (d):

a AS1397: Continuous hot-dip metallic coated steel sheet and strip – coatings of zinc and zinc alloyed aluminium and magnesium.

b AS/NZS 2728: Prefinished / prepainted sheet metal products for interior / exterior building applications – performance requirements.

c Chalk ratings undertaken in accordance with AS1580: Paints and related materials – Methods of test.

d Colour retention testing (CIE Lab units, Delta E).

Verification Required

Conformance with these requirements shall be demonstrated by providing a written statement of compliance, signed by the Chief Executive Officer or other authorised representative of the applicant company. This statement shall be supported by documentation:

- Identifying the applicable standards, specifications and or consumer/customer requirements including AS1397 and AS/NZS 2728
- Undertaking chalk rating or colour retention testing in accordance with AS1580 or CIE Lab units
- Demonstrating how compliance is monitored and maintained (including quality control and assurance procedures)
- Records of customer feedback and complaints.

7 REQUIREMENTS AND NOTES FOR LICENCE HOLDERS

Monitoring compliance

Prior to granting a licence, The Trust will prepare a supervision plan for monitoring ongoing compliance with these requirements. This plan will reflect the number and type of products covered by the licence and the level of sampling appropriate to provide confidence in ongoing compliance with criteria. This plan will be discussed with the licence applicant and when agreed will be a condition of the licence.

As part of the plan, The Trust will require access to relevant quality control and production records and the right of access to production facilities. Relevant records may include formal quality management or environmental management system documentation (for example, ISO 9001 or ISO 14001 or similar).

Licence holders are required to advise The Trust immediately of any non-compliance with any requirements of this specification which may occur during the term of the licence. If a non-compliance occurs, the licence may be suspended or terminated as stipulated in the Licence Conditions. The licensee may appeal any such suspension.

The Trust will maintain the confidentiality of identified confidential information provided and accessed during verification and monitoring of licences.

Use of Eco Choice Aotearoa Label

The licence holder shall supply information on the proposed use of the label on products and on promotional material.

The Label may appear on the wholesale and retail packaging for the product, provided that the product meets the requirements in this specification and in the Licence Conditions.

Wherever it appears, the Label must be accompanied by the Licence number e.g. 'licence No1234'. It is optional to include the spec name.

The Label must be reproduced in accordance with:

- The Licence Conditions; and
- The Eco Choice Aotearoa programme's brand kit which includes examples of keyline art for reproduction of the Label.

Any advertising must conform to the relevant requirements in this specification, in the Licence Conditions and in the keyline art.

Failure to meet these requirements for using the Eco Choice Aotearoa Label and advertising could result in the Licence being withdrawn.

Appendix A: Modern slavery and social accountability

A1 International Bill of Human Rights

In December 1948, the United Nations General Assembly adopted the Universal Declaration of Human Rights (UDHR). In December 1966, the UN General Assembly adopted two international treaties that would further shape international human rights: the International Covenant on Economic Social and Cultural Rights (ICESCR), and the International Covenant on Civil and Political Rights (ICCPR). These are often referred to as "the International Covenants." Together, the UDHR and these two Covenants are known as the International Bill of Human Rights.

The ICESCR and the ICCPR set out the civil, political, economic, social and cultural rights that everyone is entitled to:

ICESCR	**ICCPR**
• Freedom from discrimination • Right to equality between men and women • Right to life • Freedom from torture • Freedom from slavery • Right to liberty and security of person • Right to be treated with humanity in detention • Freedom of movement • Freedom of non-citizens from arbitrary expulsion • Right to fair trial • Right to recognition before the law • Right to privacy • Freedom of religion and belief • Freedom of expression • Right of peaceful assembly • Freedom of association • Right to marry and found a family • Right of children to birth registration and a nationality • Right to participate in public affairs • Right to equality before the law • Minority rights	• Freedom from discrimination • Right to equality between men and women • Right to work • Freedom to choose and accept work • Right to just and favourable conditions at work • Right to form trade unions • Right to strike • Right to social security • Right of mothers to special protection before and after birth • Freedom of children from social and economic exploitation • Right to an adequate standard of living • Freedom from hunger • Right to health • Right to education • Freedom of parents to choose schooling for their children • Right to take part in cultural life • Right to enjoy benefits of science • Right of authors to moral and material interests from works • Freedom to undertake scientific research and creative activity

A2 ILO Declaration

From ILO Declaration on the Fundamental Principles and Rights at Work, there are the following core labour standards:

- Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)
- Right to Organise and Collective Bargaining Convention,1949 (No. 98)
- Forced Labour Convention, 1930 (No. 29)
- Abolition of Forced Labour Convention, 1957 (No. 105)
- Minimum Age Convention, 1973 (No. 138)
- Worst Forms of Child Labour Convention, 1999 (No. 182)
- Equal Remuneration Convention, 1951 (No. 100)
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111)