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## EC-57-25 Pre-Painted and Resin-Coated Metal Products

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### Introduction

This document summarises the changes to **Pre-Painted and Resin-Coated Metal Products** (EC 57). EC-57 underwent a review and now includes two new requirements: Environmental Management Systems and Modern Slavery and Social Accountability.

In addition to including these two new requirements, Eco Choice updated the Legal Requirements, Hazardous Substances, Energy Management and Greenhouse Gas Emissions, and Waste Management sections. Finally, EC-57's requirement regarding transition from solvent-borne to water-borne systems has been updated to reflect current technological availability.

#### ***What does this mean for current Ecolabel Partners?***

Current Ecolabel Partners under the standard will have 12 months from the release of this standard version to comply with the changes outlined in this document.

### How to read this document

Each update and new requirement is identified by the section name, section number, and the page number where the change appears in the standard. For new or fully updated criteria, the full text is included in the summary document.

## 1. Legal Requirements

(Section 5.1; Page 10)

### *What's Changed*

The criteria under the Legal Requirements section have been updated to clarify Eco Choice's expectations for applicants and ecolabel partners. These expectations include ensuring that all environmental laws and regulations are followed, including those that protect high ecological value areas from sourcing or manufacturing processes, as well as engaging with communities (indigenous, especially) that are at risk of being directly impacted by sourcing or manufacturing processes. If manufacturing and sourcing of the product occurs outside New Zealand or are beyond the control of the licence holder, the licence holder is responsible for ensuring that their supplier and the manufacturing entity comply with environmental regulations.

### *Updated Criteria*

- a. The product must comply with the provisions of all relevant environmental laws and regulations that are applicable during the product's life cycle. The laws are expected to include the following:
  - Ensuring that areas of high ecological value are not impacted and are protected from sourcing or manufacturing processes.
  - Engagement with indigenous communities/ communities at risk directly impacted by sourcing or manufacturing processes, and that free, prior and informed consent is achieved.

Note: In the event there are no laws or regulations that covers the above requirements, the licence applicant/holder will be expected to implement processes to fulfil these requirements.

- b. Materials or processes involved in the production of 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 implement a formal supplier regulatory compliance management/assurance programme that:
  - includes documented requirements to comply with the items outlined in criterion a.
  - 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.

### *What does it mean for licence applicants and holders?*

Licence applicants/holders and ecolabel partners will need to demonstrate compliance with these criteria by providing documentation and reports outlined in explanatory notes.

## 2. Environmental Management Systems

(Section 5.2; page 10)

### *What's Changed*

The criteria under the Environmental Management Systems have been included in alignment with new versions of Eco Choice standards and the requirements under the Green Building Council of Australia and the New Zealand Green Building Council. The Environmental Management Systems criteria requires that the applicant/licence holder or manufacturer must have an environmental management system based on ISO14001 or provide details outlining processes that control for hazardous substances, discharges to air, land, water and other environmental impacts. Furthermore, applicant/licence holders are required to identify possible risks of contamination of non-compliant or banned chemicals during the manufacturing process and implement control measures to mitigate the risk.

### *New Criteria*

- a. 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.
- b. The environmental management system or processes must include a process for identifying environmental risks and opportunities (hotspot analysis) and implementing programs to reduce identified impacts to air, water and land from manufacturing activities.
- c. The risk assessment process discussed in **criterion b**, must also identify and classify hazards associated with non-compliant or banned materials/chemicals that have the potential to be used in the manufacturing process, and implement control measures to mitigate identified risks appropriate to their risk level.
- d. Should banned chemicals (or restricted chemicals that are beyond the limits outlined in this standard) be found within the product licensed, manufacturers must substitute or replace chemicals to align with the standard.

### *What does it mean for licence applicants and holders?*

In addition to a written statement of compliance by the Chief Executive Officer or otherwise authorised representative, the applicant or licence holder must provide documentation of the EMS based on ISO 14001 or details on risk assessment and mitigation processes for relevant environmental impacts.

### 3. Modern Slavery and Social Accountability

(Section 5.3; page 12)

#### *What's Changed*

The Modern Slavery and Social Accountability criteria have been updated to align with new versions of Eco Choice standards and the requirements under the Green Building Council of Australia and the New Zealand Green Building Council. Along with aligning with the national/international transition, it focuses on social issues within the workplace. The criteria require that applicants and ecolabel partners have a publicly available policy/policies which address human rights, diversity and inclusion and anti-bullying- aligning with national and international policies.

#### *Updated Criteria*

- 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 recognised 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.

**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.

- b. 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.
- c. 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 (example: manager, director, or C-suite level roles) of its organisation responsible for social and environmental sustainability.

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 Eco Choice-licensed products and services. This includes products and services sourced in NZ or overseas and extends beyond direct suppliers.

#### ***What does it mean for licence applicants and holders?***

Licence applicants and current licence holders will need to provide copies of policies, procedures, plans, and records to demonstrate how effectively the plans and procedures have been implemented.

## **4. Energy Management and Greenhouse Gas Emissions**

(Sections 5.8.1; page 19 and 5.9.1; page 23)

#### ***What's Changed***

For both the paint line or coating operations and roll forming or pressing stages of metal products in EC 57, minor administrative changes were made to the criteria, including a change of name to Energy Management and Greenhouse Gas Emissions (from Energy Management and Carbon) and clarifying language around the time frame (from “over time” to “year on year”) for more detailed clarification.

#### ***What does it mean for licence applicants and holders?***

No changes for licence applicants and holders.

## **5. Waste Management Criteria**

(Section 5.11; page 25)

#### ***What's Changed***

The Waste Management criteria have been updated in EC 57 to align with the latest versions of the Eco Choice product standards. The criteria now require the licence holder to demonstrate continuous improvement in reducing waste generation and increasing reuse and recycling rates, averaged over five years.

#### ***Updated Criteria***

- a. The pre-painted and resin coated metal products manufacturer must have effective waste management policies and procedures and/or a waste management programme covering manufacturing operations.
- 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 (when averaged over five years). Any divergence from objectives or targets should be explained in the annual report.**

#### ***What does it mean for licence applicants and holders?***

The applicant/ licence holder will need to include documentation detailing ongoing improvement objectives to reduce waste generation and increase reuse and recycling rates. Any divergence from the objectives should be explained in the report.

## **6. Hazardous Substances Criteria**

(Section: 5.6.1 Water-Borne Paints; page 13-14; criterion e; 5.6.2 Solvent-Borne Paints; page 14 -15; criterion g); 5.7 Resin Coating; page 17-18; criterion b)

#### ***What's Changed***

For water-borne or solvent-borne paints and resin coatings, Eco Choice has added a new criterion in the referenced sections above requiring licence applicants/holders to supply a publicly available document which discloses all hazardous substances and chemicals of concern in accordance with the Globally Harmonized System (GHS).

#### ***New Criterion***

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

#### ***What does it mean for licence applicants and holders?***

License applicants/holders will need to publicly provide a Safety Data Sheet that lists all hazardous substances in the product and other information identified in accordance with the New Zealand Health and Safety at Work Act and the Substances and New Organisms Act, or the local equivalent legislation in the

country where the product is manufactured. The substances should be classified in accordance with the Globally Harmonised System (GHS).

## 7. Change to Transition from Solvent-borne to Water-borne Systems

(Section 5.6.2; page 15-16)

### *What's Changed*

After careful consideration, Eco Choice Aotearoa has decided to adjust the requirement, mandating that the licence holder adopt a proactive approach to developing a full water-borne paint system and that the process be implemented within the three-year window. This decision was not made lightly, but rather in response to industry feedback stating that a complete transition to water-borne systems is not technologically possible at this time without additional environmental impacts. Instead, the new criterion requires that licence holders continue, in whatever capacity possible, to investigate ways to develop a fully water-borne paint system. Eco Choice Aotearoa will closely monitor any changes in available techniques/technologies to support the transition to a water-borne paint system, and should any plausible solutions present themselves, the Head of Standards reserves the right to revisit the criterion.

### *Updated Criteria*

The licence holder must demonstrate evaluation of options for transition from solvent borne systems to water borne systems. The options must 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.

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 Eco Choice-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.

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

***What does it mean for licence applicants and holders?***

For both licence holders and applicants, there is an expectation that licence holders will continue to explore transitioning from solvent-borne to water-borne systems as the technology and methods become available and will inform Eco Choice of their progress.

Please contact Eco Choice Aotearoa at [info@ecochoice.org.nz](mailto:info@ecochoice.org.nz) if you have any questions regarding this Standard Update.