

Technical Update Number: 1001

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Standard: EC-07 Paints

Update Type: Standard Interpretation

Managing Paint Formulation Changes

Eco Choice Aotearoa Licence Conditions requires companies to notify Eco Choice Aotearoa of changes to their products.

Paint formulations often require frequent adjustments and updates due to evolving performance requirements, raw material availability, and compliance with environmental or safety standards.

There have been instances of confusion regarding when licence holders should notify Eco Choice Aotearoa of changes to paint formulations. The lack of clarification has led to sometimes unnecessary additional audit costs and administrative burden.

To address this, we have clarified the notification requirements for paint formulation changes. The goal is to ensure that Eco Choice Aotearoa is informed of **significant** changes that could impact compliance, such as: the introduction of new products, new input ingredients, or changes to Globally Harmonised System (GHS)/New Zealand HSNO hazard classifications in existing formulation ingredients used in currently licenced formulations.

This approach aims to both address the need for flexibility required by paint manufacturers while maintaining the integrity of the EC-07 Paints standard and broader ECA certification system.

1. WE REQUIRE NOTIFICATION FOR:

- 1.1. Any new paint products and their formulations to be added to the ECA Licence not previously audited by Eco Choice Aotearoa.
- 1.2. Any new formulation ingredients not previously audited by Eco Choice Aotearoa that are being added to existing licenced formulations.
- 1.3. Any existing formulation ingredients used in a licenced formulation that have changed their hazard rating under the Globally Harmonised System (GHS)/New Zealand HSNO Classes to one that appears in EC-07 Paints Appendix A Hazardous Substances Classifications.
- 1.4. Any ingredients where its formulation quantity now exceeds the thresholds outlined in EC-07 Paints (for example: GHS/HSNO hazard statements, VOC levels).

Please refer to section 5.4 Raw Materials (Input Ingredients), and section 5.5 Formulated Paint in the Paint (EC 07-25) standard for more information.

2. WE DO NOT REQUIRE NOTIFICATION FOR:

- 2.1. Changes to formulations that contain ingredients already audited by Eco Choice Aotearoa, as long as ingredients have unchanged hazard statements, and ingredient quantities still meet the threshold requirements specified in EC-07 Paints.

Documentation of these non-notified formulation changes are expected to be maintained by the licence holder and made available when requested.

Please contact Eco Choice Aotearoa at info@ecochoice.org.nz if you have any questions regarding this Technical Update. Include the technical update number in the subject line.

Version History

Version:	Updated:	Updated By:	Description:
1.0	14/01/2026	Andrea Edwards	Initial release.