



The New Zealand Ecolabelling Trust

Licence Criteria for

Packaging and Paperboard Products

EC-10-07

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1. INTRODUCTION

Environmental Choice New Zealand is an environmental labelling programme which has been created to help consumers find products 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. The programme is managed by the New Zealand Ecolabelling Trust (the Trust).

This specification sets out the requirements that packaging and paperboard products will be required to meet in order to be licensed to use the Environmental Choice New Zealand Label. The requirements include environmental criteria and product characteristics. The specification also defines the testing and other means to be used to demonstrate and verify conformance with the environmental criteria and product characteristics.

Environmental Choice New Zealand operates to the ISO 14024 standard "Environmental labels and declarations - Guiding principles." This 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 shall be set, based on an evaluation of the environmental impacts during the actual product's life cycle, to differentiate product on the basis of preferable environmental performance.

This specification has been prepared based on an overview level life cycle assessment, information from specifications for similar products from other national labelling programmes, relevant information from other Environmental Choice New Zealand specifications, and recently published research.

This document will be 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.

2. BACKGROUND

Packaging and paperboard manufacturing can, potentially, result in a significant burden being placed on the environment. Process effluents can contain high concentrations of natural organic materials which deplete oxygen from receiving waters, adversely impacting plant and animal life. Sulphur, organochlorines and other hazardous substances, particularly halogenated organics, used in or resulting from the manufacturing process (e.g. from bleaching or for cleaning of equipment) can be persistent. They can, potentially, bioaccumulate and have toxic effects on the environment if discharged in effluents. Non-biodegradable detergents (surfactants) may also accumulate and be toxic or otherwise harmful in the environment if discharged.

This specification addresses the issue of emissions from packaging and paperboard manufacture. It aims to reduce or eliminate the discharge of toxic and environmentally persistent compounds, such as sulphur compounds, oxygen consuming organic material and organochlorines into the environment. The number

of toxic and environmentally persistent compounds covered by the specification has been increased and emission limits tightened compared with the previous specifications, to ensure a continued improvement in environmental performance.

Sustainable management of forests is an issue of much concern and debate internationally. A number of schemes have been developed to define principles, criteria and measures of sustainable management and provide processes for sustainable forest management to be independently assessed and assured. The current New Zealand specifications for paper and paper products exclude the use of fibre from New Zealand indigenous ecosystems. During previous reviews of the paper specifications, submissions were received seeking either reference to sustainable management. The proposed new criteria for fibre sources include a range of environmentally preferable options, where appropriate, and supports a preference for recycled over virgin fibre. The criterion also recognises that fibres can only be recycled a limited number of times and that some input of virgin fibre is required in the manufacturing of certain products to achieve required strengths and/or finishes. The proposed criterion accommodates the input of virgin fibre by allowing only fibre which has not been sourced from forest environments that are protected for biological and/or social reasons, and requiring a proportion of the virgin fibre to be from plantations or forests licensed under the Forest Stewardship Council (FSC), or equivalent, as being sustainably managed.

Criteria have also been included in this review regarding waste management, energy efficiency and packaging. These have been included to address environmental issues across the entire life-cycle of the products.

Based on a review of currently available information, the following product category requirements will produce environmental benefits by reducing the amount of waste paper entering the waste stream; minimising potential for contaminants in water; minimising production waste and packaging; and improving energy efficiency. As information and technology change, product category requirements will be reviewed, updated and possibly amended.

3. INTERPRETATION

APEOs (alkylphenol ethoxylates) are defined as substances that upon degradation produce alkyl phenols.

AOX means Absorbable Organic Halogen. A measure of the quantity of chlorine (and other halogens) bound to organic compounds.

COD (Chemical Oxygen Demand) means the mass concentration of oxygen equivalent to the amount of dichromate consumed by dissolved and suspended matter when a water sample is treated with the oxidant under defined conditions.

ECF means Elemental Chlorine Free

EDTAs (ethylene diamine-tetra-acetic acid) are complexing agents used to bind metals found in raw materials and in process water.

FSC refers to the Forest Stewardship Council

GEN refers to the Global Ecolabelling Network

ISO means International Organisation for Standardisation.

Label means the Environmental Choice New Zealand Label.

NO_x is a joint chemical abbreviation for nitrogen oxides (NO, N₂O and NO₂). In this document NO_x means total NO and NO₂ measured as NO₂ equivalents.

P is the atomic symbol for phosphorus. In this document P means phosphorus discharge to water.

PCDD refers to Polychlorinated dibenzo-p-dioxins.

PCDF refers to Polychlorinated dibenzofurans.

PCP refers to Pentachlorophenol.

Post-consumer fibre refers to material generated by households, or by commercial, industrial and institutional facilities in their role as end-users of the product, which can no longer be used for its intended purpose. This includes returns of material from the distribution chain.

Pre-consumer fibre refers to material diverted from the waste stream during a manufacturing process. Excluded is re-utilisation of materials such as rework, or scrap generated in a process and capable of being reclaimed within the same process that generated it.

Readily biodegradable surfactants are those where the average level of biodegradation observed in an aerobic sewage treatment plant is at least 90% during a residence time of not more than 3 hours. In order to meet this requirement the surfactant must either meet the requirement for “readily biodegradable” when determined using one of the five test methods described in the OECD Guidelines for Testing of Chemicals, Test Guidelines 301A-301E **OR** achieve a biodegradability of at least 80 % when tested by the OECD method, published in the OECD technical report 11 June 1976 on the “Proposed Method for the Determination of the Biodegradability of Surfactants used in Synthetic Detergents” **OR** as listed in the Danish Environmental Protection Agency report “Environmental Health Assessment of Substances in Household Detergents and Cosmetic Detergent Products” (200), or equivalent test. The pass level of 80 % recognises the inherent experimental variability of the OECD test.

S (Sulphur) means gaseous emissions of sulphur to the atmosphere, such as sulphur dioxide and reduced sulphur compounds.

TCF means Totally Chlorine Free.

4. CATEGORY DEFINITION

This category includes all packaging and paperboard products manufactured from virgin and recycled pulp as further defined in the sub-categories in this section.

The sub-categories are:

4.1 Paper mulch mats;

- 4.2** All products made from or including macerated recycled paper products, as further defined in (a) and (b), below:
- (a) Thermal insulation;
 - (b) Packaging products, such as paper envelopes.
- 4.3** All moulded paper products made from recycled paper, such as egg cartons, fruit trays, hobby and craft forms; and
- 4.4** The following paperboard products:
- (a) Corrugated fibreboard products made by combining one or more fluted mediums with one or more external and/or internal liners. Such products are used in the manufacture of packaging (including cases, boxes, cartons, packing and wrappers).
 - (b) Solid fibreboard products made from multiple laminated piles. Such products are used in the manufacture of picture backs, art board, game boards, book covers and packaging (including cases, boxes and cartons).
 - (c) Carton board products made from coated or uncoated folding carton boards (boxboards). These materials are generally manufactured as multi-ply sheets of thickness between 300 and 1100 µm, often incorporating fibre of lower quality in the “filler” or interior plies. Such products are used in a variety of applications but predominantly in the manufacture of retail cartons.

To be licensed to use the Label, a packaging or paperboard must meet all of the environmental criteria set out in clause 5 and 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 laws and regulations that are applicable during the product's life cycle.

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 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; and
- using and disposing of the product.

The documentation required may include, as appropriate:

- procedures for approving and monitoring suppliers and supplies; and
- information provided to customers and contractors regarding regulatory requirements.

It is not intended to require licence holders to accept increased legal responsibility or liability for actions that are outside their control.

5.2 Fibre Source

Criteria

- (a) The fibre for each sub-category of packaging and paperboard products shall be as follows:

Product Type	Recycled Content (%)	Post-consumer Recycled (%)
Mulch Mat	85	70
Macerated products	100 20 for liner	80 10 for liner
Moulded products	100	75
Paperboard	80	25

- (b) For paperboard products
- (i) The licence applicant (or holder) must be able to demonstrate that all virgin fibre in the paperboard products is from legally harvested sources.
 - (ii) No virgin fibre input (including forest waste wood sources) is to be sourced from native forests, unless those forests are licensed under the Forest Stewardship Council (FSC) as sustainably managed (or equivalent certification); and
 - (iii) At least 30 % of the virgin fibre must be sourced from plantations or forests licensed under the Forest Stewardship Council (FSC) as sustainably managed (or equivalent certification).
- (c) The licence holder must have and report on a fibre procurement programme that has the aims of maximising:
- (i) the post-consumer component of recycled content;

- (ii) the total percentage of fibre that is recycled, waste wood and FSC (or equivalent) licensed (in that order of preference) in paperboard products.

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 (as relevant):**

- demonstrating the proportion of fibre types included in each product;
- for recycled fibre, demonstrating whether the fibre is pre- or post-consumer;
- recording the supplier, nature and geographical source of all virgin fibre inputs;
- including certificates or other evidence on forest management certification and chain of custody (to confirm the virgin fibre that is used is from a certified sustainably managed source),
- annual reports on the fibre procurement programme; and
- describing management systems in place to ensure that these requirements are consistently met.

The following certification schemes will be accepted as sources of information to demonstrate legal harvesting, where certificates and chain of custody evidence is available for virgin fibre sources:

- Forest Stewardship Council – “Certified” or “Controlled”
- Programme for the Endorsement of Forest Certification (PEFC)¹ (<http://www.pefc.org/>)
- Canadian Standards Association (CSA) National Standard for Sustainable Forest Management (<http://www.fpac.ca/>)
- Sustainable Forestry Initiative® (SFI) (<http://www.aboutsfi.org/>)
- Malaysian Timber Certification Council.

The following certification schemes will be accepted as equivalent to FSC certification:

- Pan European Forest Certification Council (PEFC) (<http://www.pefc.org/>)
- Canadian Standards Association (CSA) National Standard for Sustainable Forest Management (<http://www.fpac.ca/>)
- Sustainable Forestry Initiative® (SFI) (<http://www.aboutsfi.org/>).

For any other schemes to be considered, the applicant will be required to provide detailed information that demonstrates the certification scheme is credible and equivalent. For examples of the type of information required, refer to the UK Central Point of Expertise on Timber Procurement (CPET) assessments of certification schemes available on www.proforest.net/cpet.

Intention

¹ The Australian Forest Certification Scheme (AFCS/AFS) is recognised as part of PEFC

Environmental Choice will monitor reported fibre composition and procurement information with the intention of increasing the minimum percentages set in these criteria at future reviews when higher levels are attainable.

5.3 Hazardous Substances

5.3.1 Bleaches

Criteria

The paperboard or packaging product shall not be bleached.

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. **This statement shall be supported by relevant production and quality control documentation.**

5.3.2 Dyes, Pigments and Coatings

Criteria

- (a) No dyes, pigments or coatings shall be used on either the paperboard or packaging that is assigned or may be assigned at the time of application any of the following risk phrases (or combinations thereof) in accordance with European Union Directive 67/548/EEC, or equivalent ratings from national or international schemes:
- R40 (limited evidence of carcinogenic effect)
 - R43 (may cause sensitisation by skin contact)
 - R45 (may cause cancer)
 - R46 (may cause heritable genetic damage)
 - R49 (may cause cancer by inhalation)
 - R50 (very toxic to aquatic organisms)
 - R51 (toxic to aquatic organisms)
 - R52 (harmful to aquatic organisms)
 - R53 (may cause long-term effects in the aquatic environment)
 - R60 (may impair fertility)
 - R61 (may cause harm to the unborn child)
 - R62 (possible risk of impaired fertility)
 - R63 (possible risk of harm to the unborn child)
 - R68 (possible risk of irreversible damage)
- (b) No dyes, pigments or coatings shall be used that contain phthalates, mercury, lead, copper, chromium, nickel, aluminium or cadmium as constituent parts. Copper phthalocyanine dyes or pigments may, however, be used.

- (c) The levels of ionic impurities in the dyes and pigments used shall not exceed the following: Ag 100 ppm; As 50 ppm; Ba 100 ppm; Cd 20 ppm; Co 500 ppm; Cr 100 ppm; Cu 250 ppm; Fe 2,500 ppm; Hg 4 ppm; Mn 1,000 ppm; Ni 200 ppm; Pb 100 ppm; Se 20 ppm; Sb 50 ppm; Zn 1,500 ppm.
- (d) Acrylamide monomer must not be present as a constituent part of coatings.
- (e) Azo dyes or pigments which may release one of the amines listed in the Table below may not be used.

Amine	CAS-number
4-amino-biphenyl	92-67-1
Benzidine	92-87-5
4-chloro-toluidine	95-69-2
2-naphtylamine	91-59-8
o-aminoazo-toluene	97-56-3
2-amino-4-nitro-toluene	99-55-8
p-chloroaniline	106-47-8
2,4-diamino-anisol	615-05-4
4,4'-diamino-diphenylmethane	101-77-9
3,3'-dichlorobenzidine	91-94-1
3,3'-dimethoxybenzidine	119-90-4
3,3'-dimethylbenzidine	119-93-7
3,3'-dimethyl-4,4'-diamino-diphenylmethane	838-88-0
p-cresidine	120-71-8
4,4'-methylenebis(2-chloroaniline)	101-14-4
4,4'-oxydianiline	101-80-4
4,4'-thiodianiline	139-65-1
o-toluidine	95-53-4
2,4-toluilenediamine	95-80-7
2,4,5-trimethylaniline	137-17-7
o-anisidinedimethoxyaniline	90-04-0
2,4-xylidine	95-68-1
4,6 – xylidine	87-62-7
4-animoazobenzene	60-09-3

- (f) The product to which the label is applied must not be impregnated, coated or otherwise treated in a manner which would prevent recycling in New Zealand.

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 (as relevant) that:**

- identifies the dyes, pigments and coatings used;
- MSDS (material safety data sheets) or other information to demonstrate the risks, if any, assigned to dyes, pigments and coatings used;
- demonstrates that no acrylamide monomer is used; and
- describes any coating or treatment processes used and demonstrates that these do not prevent recycling (including for example written confirmation

from the Recycling Operators of New Zealand – RONZ) that the products are recyclable in New Zealand).

5.3.3 Surfactants and Foam Inhibitors

Criteria

- (a) Where surfactants are used for de-inking recycled paper input, these surfactants shall be readily biodegradable.
- (b) Foam inhibitors used in manufacturing processes must meet either (i) or (ii) below:
 - (i) not be assigned at the time of assessment any of the R50-R53 risk phrases in accordance with the European Directive 67/548/EEC;
 - (ii) 95 % by weight of the constituent substances that have a foam inhibiting or retarding effect must be either readily or ultimately biodegradable.

Verification Required

Conformance with these requirements shall be demonstrated by providing a written statement signed by the Chief Executive Officer or other authorised representative of the Applicant company. **This statement shall be supported by documentation (as relevant) that:**

- identifies any surfactants or foam inhibitors used;
- MSDS (materials safety data sheets); and
- test reports provided by laboratories competent to perform the relevant tests.

Test methods shall be those nominated below or equivalents. If an equivalent method is to be used, Environmental Choice may require details of the method and its validation.

Testing Methods

The surfactant must either meet the requirement for “readily biodegradable” when determined using one of the five methods described in the OECD Guidelines for testing of chemicals, Test Guidelines 301A-301E or achieve a biodegradability of at least 80 % when tested by OECD method published in the OECD technical paper report of 11 June 1976, or as listed in the Danish Environmental Protection Agency report “Environmental Health Assessment of Substances in Household Detergents and Cosmetic Detergent Products” (2001), or equivalent test. Alternatively, the foam inhibitor may meet the requirement for ultimate biodegradability in accordance with the OECD Test Guidelines 302A-302C.

5.3.4 Cleaning Solvents and Biocides

Criteria

- (a) Solvents used in the cleaning of production/manufacturing equipment must be free of halogenated hydrocarbons, alkylphenol ethoxylates (APEOs) or other alkylphenol derivatives.
- (b) The active components in biocides or biostatic agents used to counter slime-forming organisms in circulation water systems containing fibres shall not be potentially bio-accumulative.

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 (as relevant) that:**

- identifies the cleaning solvents and biocides used;
- MSDS (material safety data sheets); and
- test reports for bio-accumulability of biocides or biostatic agents and/or data sheets in accordance with European Union Directive 91/155/EEC, or equivalent standard, with sufficient data and references to test methods.

5.3.5 Adhesives

Criteria

- (a) Adhesives used in the production, conversion and packaging of paper products shall not contain alkylphenol ethoxylates (APEOs), phthalates, halogenated solvents or ethylene glycol ethers classified as harmful to health in accordance with EU Directive 67/548/EEC with risk phrases R60 or R61.
- (b) Only polyvinyl acetate polymer or similar inherently biodegradable glues may be used for the manufacture of paper mulch mat.

Verification Required

Conformance with this requirement shall be demonstrated by providing a written statement of compliance, signed by the Chief Executive Offices of the Applicant company. **This statement shall be supported by information on the adhesives used and relevant production and quality control documentation.**

5.4 Process Emissions

5.4.1 Emissions to Water

Criteria

The combined emissions from production of paperboard (apportioned to the product being licensed) shall not exceed:

- (a) 20 kg of COD per tonne of paperboard produced; or
- (b) 0.25 kg AOX (as Cl) per tonne of paper produced.

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:**

- test reports;
- calculations and
- production and quality control information.

Test methods shall be those nominated below or equivalents. Test reports must be from laboratories competent to perform the relevant tests. If an equivalent method is to be used, Environmental Choice may require details of the method and its validation.

Calculation

For recycled fibre sources, emissions arising from the original production of recycled paper shall not be included in the calculations.

Testing Methods

COD shall be determined using the method in ISO 60610, APHA 5220 or equivalent. Sampling for COD analysis must take place after the operation of wastewater treatment. Analysis of COD must be based on an unfiltered sample. COD tests shall be performed on at least one sample per week.

5.4.2 Emissions to Air

Criteria

The combined emissions from both pulp and paper production (apportioned to the product being licensed) shall not exceed:

- (a) 1.5 kg of sulphur compounds (as S) per tonne of paper produced. The emissions related to the production of electricity need not be accounted for.
- (b) 3.0 kg of nitrogen oxides (as NO₂ equivalents) per tonne of paper produced. The emissions related to the production of electricity need not be accounted for.
- (c) 1,500 kg of carbon dioxide from non-renewable sources per tonne of paper produced, excluding emissions from the production of electricity.

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:**

- Test and/or monitoring reports;
- calculations and
- production and quality control information.

5.5 Contaminants in Soil

Criteria

Metal content in paper mulch mat shall not exceed the following limits:

	mg/kg (dry weight)
Copper	1.31
Chromium	1.54
Cadmium	0.012
Lead	1.56
Zinc	5.87

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 test results for total metal content.**

Verification Required

Total metal content shall be established at trace level, using Total Recoverable Digest USEPS 200.2 method or equivalent. If an equivalent method is used, Environmental Choice may require details of the test method and its validation.

Explanation

The mulch mat is left in the soil and there is potential for any contaminants that may be in the product to be released or build up in the soil.

Paper used to make the mulch mat is likely to be printed. Ink products used in New Zealand may contain low levels of copper. Ink products used overseas and which may be found on printed materials imported to New Zealand may contain chromium, cadmium, lead or zinc. Adverse effects on the environment are likely if levels of these materials exceed natural background levels in soils. The limit levels in this criterion have been set at 10 % of the arithmetic mean background levels for non-volcanic soils in the Auckland Region (reference: Background Concentrations of Inorganic Elements in Soils for the Auckland Region. Auckland Regional Council Technical Publication 153, October 2001 and reprinted April 2002, ISSN 1175 205X). The 10 % level has been set on the basis that more than 90 % of the mulch mass could be lost (e.g. by decomposition and transpiration) without a net increase in metal concentration in the soil.

5.6 Waste Management

Criteria

- a) The packaging or paperboard product manufacturer or supplier must have effective waste management policies and procedures and/or a waste management programme.
- b) Licence holders must report annually to Environmental Choice New Zealand 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;
 - quantities and types of waste burned internally for energy recovery;
 - waste generation related to production; and
 - initiatives taken to reduce waste generation and improve recovery/recycling of waste.

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 on waste generation, minimisation and management.

5.7 Energy Management

Criteria

- (a) The packaging or paperboard product manufacturer or supplier must have effective energy management policies and procedures and/or an energy management programme.
- (b) Licence holders must report annually on energy management, including:
 - total energy use;
 - breakdown of total energy use to types of energy used;
 - energy use related to production;
 - initiatives taken to reduce energy use and improve energy efficiency; and
 - initiatives taken to calculate and reduce CO₂ emissions associated with energy use.

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 energy management policies, procedures and programmes; and
- includes annual reports on energy use and management.

6. PRODUCT CHARACTERISTICS

Criteria

The product shall be fit for its intended use and conform, as appropriate, to relevant product performance standards.

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:**

- identifying the applicable standards and or consumer/customer requirements; and
- demonstrating how compliance is monitored and maintained.

7. REQUIREMENTS AND NOTES FOR LICENCE HOLDERS

Monitoring Compliance

Prior to granting a licence, Environmental Choice will prepare a 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, Environmental Choice 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 9000 or ISO 14001 or similar).

The monitoring plan will require the licence holder to advise Environmental Choice immediately of any noncompliance 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.

Environmental Choice New Zealand will maintain the confidentiality of identified confidential information provided and accessed during verification and monitoring of licences.

Using the Environmental Choice Label

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 words “packaging” or “paperboard product” and by the Licence Number eg ‘licence No1234’.

The Label must be reproduced in accordance with the Environmental Choice programmes keyline art for reproduction of the Label and the Licence Conditions.

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 Environmental Choice Label and advertising could result in the Licence being withdrawn.

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