

Environmental Choice New Zealand Trust

Licence Criteria for

Recycled Plastic Products

EC-06-01

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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.

Environmental Choice New Zealand follows 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.

The Environmental Choice Management Advisory Committee (ECMAC) is pleased to publish this revised specification for plastic products using recycled plastics. The specification has been revised to take account of developments in products that can be made from recycled plastics and to include new requirements on energy management.

This specification sets out the requirements that recycled plastic 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 verify conformance with the environmental criteria and product characteristics.

This is the second review of the Recycled Plastic Products specification, originally published in 1992. This specification replaces the existing specification document Recycled Plastic Products (EC-06-98). The original document (EC-09-92) was prepared with the help of an expert task group comprising representatives of industry, relevant science and technology expertise and environmental and consumer interest groups. Reviews of the specification have involved discussions with relevant interested parties and a formal notification and consultation period of sixty days.

This specification will be valid for a period of five years. Twelve months before the expiry date (or at an earlier date if recommended by ECMAC), a further review process for the specification will be initiated. Existing licensees have a one-year period to comply with any new specification requirements.

2. BACKGROUND

Annually, plastic accounts for approximately 7% by weight, or up to 20% by volume, of solid waste in New Zealand. Incorporating plastic waste in the manufacture of new products will reduce the amount of plastic entering the waste stream and help reduce use of virgin plastic resources. Encouraging significant percentages of recycled plastics in products will encourage the recycling ethic and support closing the recycling loop.

Plastics New Zealand released results of a study in 1999 which indicated the total collection of plastic for recycling in New Zealand was approximately 23,000 tonnes.

Manufacturing plastic products involves processes that use energy, such as extrusion and moulding. Energy management requirements have been included in this specification to encourage energy efficiency and help reduce overall energy use.

Based on a review of currently available life cycle information, the following product

category requirements are likely to produce environmental benefits by reducing the amount of plastic entering the waste stream, conserving a non renewable resource, and encouraging recycling. Life cycle review is an ongoing process as information and technology change; product category requirements will be reviewed, updated and possibly amended.

3. INTERPRETATION

“EECA (Energy Efficiency and Conservation Authority)” is an independent Government agency, set up in legislation, to encourage, promote and support energy efficiency, economic and renewable sources of energy.

“Energy Management Programme” means a program 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.

“Label” means the Environmental Choice New Zealand Label.

“Recycled Plastic” includes:

Post-Consumer: 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: Material diverted from the waste stream during a manufacturing process. Excluded is re-utilisation of materials such as rework, regrind or scrap generated in a process and capable of being reclaimed within the same process that generated it.

4. CATEGORY DEFINITION

This category includes all plastic products made from recycled plastic as further defined in the sub -categories in this section.

The sub-categories are:

- 4.1 Construction materials: includes all materials used in the construction of structures whether stationary or transportable, such as lumber, fencing, shingles or pavers.
- 4.2 Produce containers: includes containers for agricultural produce such as eggs, fruit and vegetables.
- 4.3 Non-food containers: includes all containers for non-food products such as detergent bottles, drums and pallets.
- 4.4 Office supplies: includes all implements and containers for office use such as dispenser holders, transparency sheets and ring binders.
- 4.5 Recreational equipment and outdoor furniture: includes all implements and support structures for the recreational market such as playground equipment, mats, patio tables and chairs.

- 4.6 General household products: includes buckets, clothes pegs, coat hangers, cutlery trays and waste bins.
- 4.7 Horticultural supplies: includes all products, containers, implements and support structures used in horticultural activities such as flower pots, trays, garden edging, wheel barrows and compost bins.
- 4.8 Flexible packaging: includes plastic bags and sheets.

To be licensed to use the Label, the recycled plastic product or packaging must meet the environmental criteria set out in clause 5 and product characteristics set out in clause 6.

5. ENVIRONMENTAL AND PERFORMANCE 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 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;
 - Using and disposing of the product; and
- Relevant land use or discharge laws.

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.

5.2 Recycled Content

Criteria

To be licensed to carry the Label the products made from recycled plastic must meet the criteria specific to its sub category.

- 5.2.1 Plastic products identified in sub-categories 4.1 through 4.5 must contain a minimum of 50% by weight of recycled plastic.
- 5.2.2 Plastic products identified in sub-categories 4.6 through 4.7 must contain a minimum of 75% by weight of recycled plastic.
- 5.2.3 Plastic products identified in sub-categories 4.8 must contain a minimum of 30% by

weight of recycled plastic.

Notes:

1. For some specialised products (eg PVC pipes) product performance standards set maximum recycled content requirements. Where this is the case, the maximum limit set in the relevant performance standard will apply as the minimum recycled content acceptable for award of an Environmental Choice licence. The criteria set above will not therefore apply.
2. Where a product contains components other than plastic (for example a wheelbarrow), the % requirement applies to the plastic component and the total weight of the plastic component only.

Verification Required

Conformance with the criteria 5.2.1, 5.2.2 and 5.2.3 shall be stated in writing and signed by the Chief Executive Officer of the applicant company. These statements shall be supported by relevant quality control and production documentation.

5.3 Plastic Resin Code

Criteria

To be licensed to carry the Label, the recycled plastic product (or component) must be marked on each individual item with the appropriate plastics resin identification code promulgated by the Plastics Institute of New Zealand (refer to Appendix B).

Notes: Exceptions to this criteria may be made for products in sub-category 4.8.

Verification Required

Conformance with the criteria shall be stated in writing and signed by the Chief Executive Officer of the applicant company. These statements shall be supported by relevant quality control and production documentation.

5.4 Coating, Labels and other Treatment

Criteria

The recycled plastic product (or component) must not be impregnated, labelled, coated or otherwise treated in a manner which would prevent recycling in New Zealand or in the country where the product is used.

Verification

Conformance with this criteria shall be stated in writing and signed by the Chief Executive Officer of the applicant company. The statements shall be supported by relevant quality control and production documentation.

5.5 Energy Management

Criteria

The producer of recycled plastic products must have effective energy management policies and procedures and/or an energy management programme.

Verification

Conformance with this requirement shall be stated in writing and signed by the Chief Executive Officer of the applicant company. This statement shall be accompanied by relevant quality control and production documentation.

Explanation

This document could be based on the 10 key principles as outlined in EECA's Energywise Companies Campaign Charter of Key Principles or equivalent, see Appendix A.

Intention

New Zealand's first National Energy Efficiency and Conservation Strategy will be issued in October 2001 and aims to make energy efficiency and use of renewable energy mainstream energy solutions for New Zealand. This strategy also intends to involve stronger commitments to implementing measures to, achieve energy and greenhouse gas reductions. Environmental Choice will review and revise energy criteria at a future date to align, as appropriate, with the national strategy.

6. PRODUCT CHARACTERISTICS

Criteria

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

Verification Required

Conformance with this requirement shall be stated in writing and signed by the Chief Executive Officer of the applicant company. This statement shall be supported by documentation demonstrating how conformance is monitored and maintained.

7. REQUIREMENTS AND NOTES FOR ENVIRONMENTAL CHOICE 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 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 a licensed 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 (eg "licence No. 1234) and one of the following (or similar) combinations of words. The combination of words shall be selected to clearly identify what has the recycled plastic content (eg the product or packaging, or a component of either).

- (a) recycled plastic product
- (b) recycled plastic packaging
- (c) recycled plastic product inside

- (d) recycled plastic component(s)
- (e) recycled plastic product and packaging

The combination(s) of words to be used will be approved by Environmental Choice New Zealand and will be a condition of the licence,

The Label must be reproduced in accordance with the Environmental Choice programme's 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.

APPENDIX A

Energy Management

Companies must have effective energy management policies and procedures and/or an energy management programme based on the following key principles.








EnergyWise Companies Campaign - Charter of Key Principles

1. Establish a corporate policy on energy efficiency
2. Establish accountability for energy management
3. Set targets for improved energy performance
4. Monitor and evaluate energy usage levels
5. Hold regular energy performance reviews
6. Improve awareness of energy efficiency among employees
7. Incorporate energy management into wider business or quality improvement processes
8. Consider economic investment opportunities in energy efficiency
9. Ensure energy efficiency considerations are taken into account in major (new or retrofit) building and factory construction projects
10. Report energy performance changes and improvements to employees and, where appropriate, shareholders

The Energywise Companies Campaign is run under the auspices of the Energy Efficiency and Conservation Authority. For more information visit their website www.eeca.govt.nz or tel (04) 470 2200.

APPENDIX B

PLASTICS RESIN IDENTIFICATION CODE

	Type of Plastic	Characteristics	Application
	Polyethylene Terephthalate PET	Clear, tough, solvent resistant, often used as a fibre	Carbonated soft drink bottles, pillow and sleeping bag filling, textile fibres
	High Density Polyethylene HOPE	Hard to semi-flexible, waxy surface, opaque, melts at 135°C	Crinkly shopping bags, freezer bags, milk bottles, bleach bottles, buckets, rigid agricultural pipe, milk crates
	Unplasticised Polyvinyl Chloride UPVC Plasticised Polyvinyl Chloride PPVC	Hard rigid, can be clear, can be solvent welded Flexible, clear, elastic, can be solvent welded	Electrical conduit, plumbing pipes and fittings, blister packs, wall cladding, roof sheeting, bottles Garden hose, shoe soles, cable sheathing, blood bags and tubing, watch straps
	Low Density Polyethylene LDPE	Soft, flexible, waxy surface, translucent, melts at 80°C, scratches easily	Garbage bags, squeeze bottles, black irrigation tube, black mulch film, garbage bins
	Polypropylene PP	Hard but still flexible, waxy surface, melts at 145°C, translucent, withstands solvents. Very versatile material with many applications	Potato crisp bags, drinking straws, microwave ware, plastic kettles, plastic garden settings, baby baths, plastic hinged lunch boxes
	Polystyrene PS Expanded Polystyrene EPS	Clear, glassy, rigid, brittle, opaque, semi-tough, melts at 95°C. Affected by fats and solvents Foamed, light weight, energy absorbing, heat insulating	Plastic cutlery, imitation "crystal glassware", low cost brittle toys, video cases Foamed polystyrene hot drink cups, hamburger take-away clamshells, foamed meat trays, protective packaging for fragile items
	Includes all other resins and multi materials (eg laminates). Examples are polyamide, acrylonitrile butadiene styrene (ABS), acrylic, nylon, polyurethane (PU) and phenolics		