



**National Council of
Women of New Zealand**

Te Kaunihera
Wahine O Aotearoa

National Office
Level 4 Central House
26 Brandon Street
PO Box 25-498
Wellington 6146
(04) 473 7623
www.ncwnz.org.nz

14 January 2006

S07.05

**Submission to the Eco labelling Trust on the Draft Specification Commercial
Modular Tile Carpets**

The National Council of Women of New Zealand (NCWNZ) is an Umbrella organization representing 42 Nationally Organised Societies and Individual Members. It has 32 branches throughout the country attended by representatives of those societies and some 150 organisations.

The Function of NCWNZ is to work for the well-being of women, the family and the community at local levels through research, study, discussion, and action.

The council as the spokesperson for these women's groups has had a long term interest in initiatives that are established to improve the quality of the environment and reduce or eliminate components that may cause harm to the environment or Health and safety risks to the consumer.

The specifications in this draft document clearly define the testing and other means to be used in the production, distribution, use and disposal to verify conformance of this product.

NCWNZ has written submissions previously on many products applying for licence to use Environmental Choice New Zealand Labels and applaud the work of the Ecolabelling Trust, which enables the consumer to find products and ease the burden on the environment.

Following receipt of the Draft Specifications, our members were circulated in email and responses to questions asked about the product were received from several members throughout New Zealand. Branches were in recess over December and January so replies were fewer in number than is usual. This submission has been prepared by the nucleus committee of Consumer Affairs Standing Committee.

While NCWNZ members do not have an in depth knowledge of the technical aspects involved in the manufacturing process they have contributed general comments relating to environmental criteria and product characteristics addressed in the Draft Specifications for Modular Tile Carpets.

Comments on the draft are as follows

All responses wholeheartedly supported the labeling of products based on research and verifiable information and not on misleading advertisements or advertising gimmicks. This will enable consumers to make informed choices.

Most responses considered the 5 year validity period satisfactory before any further review process was initiated. One reply considered the validity period too long and suggested 3-4 years. Another response suggested a longer time frame could be considered after the first review process had been successfully completed.





Consumer choice to purchase an environmentally friendly product was considered a definite advantage with the assurance it was licensed to use the Environmental Choice New Zealand Label.

It was generally agreed that as information and technology change- the requirements for Modular Tile Carpets should be reviewed, updated, and amended if possible.

Responses endorsed the requirements for the products specifications to include that they be removable, re useable, and able to be recycled. Also that the product was not manufactured using any known carcinogenic agents or hazardous substance was fully supported.

Some concern was expressed relating to health and safety issues for workers during the manufacturing process and for the consumer after purchase.

It was recommended there be a major concern with regard to VOC emissions and AIR emissions (including greenhouse gases) and minimization of pollution.

Some members raised the issue of product monitoring and considered the verification required (providing a written statement of compliance signed off by the chief executive Officer or other authorized representative of the applicant company and supporting documentation) possibly not sufficient evidence. It was suggested the verification should also be checked or carried out by a registered or qualified person to ensure the requirements are met.

It was generally agreed that the cost of the finished product may increase as a result of meeting the licensing requirements to use the Environmental Label, however, it was considered that the resulting benefits for the consumer and the environment would offset any increased cost and therefore not a major concern.

A few responses suggested that the label should show full details of the company's brand or company name and contact details on the wholesale and retail packaging for the product as well as the words "Commercial Modular Tile Carpets" and the license number on the label where ever it appears.

NCWNZ thanks the New Zealand Ecolabelling Trust for the opportunity to comment on the Draft specification for Commercial Tile Carpets and would welcome ongoing involvement in the outcome of this product application.

NCWNZ will continue to maintain interest in any endeavours to protect and improve our environment in New Zealand through the use of the Environmental Choice Label.

Christine Low
President

Jan Brown
Convener Consumer Affairs Standing Committee