



**National Council of
Women of New Zealand**

Te Kaunihera
Wahine O Aotearoa

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**Submission to the New Zealand Ecolabelling Trust on the Proposed Licence Criteria for
Floor Care Products**

The National Council of Women of New Zealand (NCWNZ) is an umbrella organisation representing 46 Nationally Organised Societies and National Members. It has 28 branches throughout the country attended by representatives of those societies and some 150 other societies.

The Council's functions are to serve women, the family and the community at local, national and international levels through research, study, discussion and action. NCWNZ welcomes the opportunity to consider this discussion document. This response has been prepared by the Consumer Affairs Standing Committee.

Introduction

NCWNZ has written submissions previously on many products applying for a license to use the Environmental Choice New Zealand label and supports the work of the Ecolabelling Trust which enables the consumer to find and use products that ease the burden on environment, and reduce or eliminate substances that may cause harm or health and safety risks to the consumer.

NCWNZ supports the specifications as proposed in the document, to not only take account of harmful substances, but also address concerns re energy management and packaging waste and consumer protection.

Specific Comments

NCWNZ members considered they did not have in-depth knowledge and understanding about the more complex and technical criteria on formulation requirements, complexing agents etc as addressed under Environmental Criteria and Product Characteristics to make specific comment to all of the general comments relating to these Floor Care Products' specifications.

- All responses agreed that the product must comply with the provisions of all relevant laws and regulation that are applicable during the product's life-cycle by provision of a written statement on regulatory compliance. This statement, to be signed and supported by documentation, identifies the applicable regulatory requirements and shows how compliance is monitored and maintained. It was further agreed that all toxic components including APEOs, copper, carcinogens, mutagens etc as listed should be banned to protect the worker, the consumer and to reduce stress on sewage systems and the environment.
- Most responses considered the five-year validity time-frame satisfactory for Floor Care Products and a further review process initiated 12 months before licence expiry. A few replies considered a shorter validity time-frame preferable if at all feasible, such as a one-year period suitable time-frame for compliance with any new specification requirements.





- It was generally agreed that environmental labelling specification included criteria that are objective, reasonable and verifiable also testing g and other means to be used should demonstrate and verify conformance with the environmental criteria and product characteristics in order to be licensed.
- Members' responses expressed some concern relating to health and safety issues for workers during the manufacturing process and for the consumer after purchase. It was recommended that ongoing monitoring and protection be rigorously maintained and that product manufacturers have effective policies and procedures in place and report annually.
- Responses strongly supported the criteria relating to Consumer Information and agreed with the proposed approach. It was emphasised that all Floor Care Product labelling must display a list of product ingredients that complies with the stated requirements and includes step-by-step instructions. The proposal to include a graphical representation or icons on the labels was considered necessary to assist non-English-speaking consumers. The labels, whether in English or including icons or graphical representation, need to be clearly understood and include identifiable hazard symbols in bold print and strong colours. The instructions, for proper use to achieve maximum product performance and minimise waste, should include clear information on reuse, recycling and/or correct disposal of packaging.
- Members' responses agreed with the proposed approach for the listed criteria for packing requirements and considered this of prime importance to provide consumers with, not only product information, but also, reassurance that packaging does not contain toxic content and that the plastic is reusable or recyclable. Responses did not agree that packaging for certain products should be exempt from the criteria specified. To achieve reduction and elimination of components that are not actively involved in floor care, thus reducing stress on sewage systems and on the environment in general, is certainly a desirable goal and should gain consumer acceptability. When the Environmental Choice label appears on the wholesale and retail packaging after meeting the requirements in the specification and accompanied by the Licence Number, it will provide the concerned consumer with reassurance and confidence to purchase the product.

NCWNZ thanks the New Zealand Ecolabelling Trust for the opportunity to comment on these Proposed Licence Criteria for Floor Care Products 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 New Zealand Eco-system through the use of the Environmental Choice Label.

A handwritten signature in black ink, appearing to read 'C Low', written in a cursive style.

Christine Low
National President

Jan Brown
Convener, Consumer Affairs Standing Committee