Standard No: PCPv4.1i-2013 Issued: 9 July 2014

Good Environmental Choice Australia Environmental Performance Standard





USE OF GECA STANDARDS

This standard identifies environmental, quality, regulatory and social criteria that the top products sold in the Australian marketplace can meet in order to be recognised by GECA as "environmentally preferable".

This standard seeks to set the benchmark for environmentally preferable products. The Australian Ecolabel Program is based on the international standard ISO 14024: "Environmental Labels and Declarations - Guiding Principles" which requires environmental labelling specifications to include criteria that are objective, reasonable and verifiable.

This standard may be used by GECA appointed conformity assessment bodies to verify whether a product fully conforms to the criteria set by this standard. Where a product is certified under the Australian Ecolabel Program, it may display the GECA ecolabel (the "Environmental Choice Australia Mark") to show that the product has been independently audited and demonstrates conformance with the environmental and social criteria detailed in this standard.

The purpose of voluntary environmental labels and declarations is the communication of verifiable and accurate information for the numerous environmental aspects of goods and services. As required by the Trade Practices Act the information cannot be misleading. Such information encourages the demand for, and supply of, those products that cause less harm to the environment, thereby stimulating the potential for market-driven continuous environmental improvement. Where a company has a product certified as conforming to this standard, it may gain a marketing advantage in government and business procurement programs, as well as greater market recognition in general because of its independently verified environmental attributes.

The principles of life cycle management have been used to set criteria to address relevant environmental loads typical in a product category. As such, this standard may also offer guidance for Australian producers to reduce the environmentally harmful impacts of their product(s). Producers may use the environmental criteria in this standard to design and refine the processing, manufacturing and delivery of their product(s). In addition producers may find other environmental issues and more measures along the product's life cycle, which are beyond the content of this standard. Producers are encouraged to include and adapt improvements in their environment programs and designs to aim for even better environmental results where technically possible. GECA welcomes feedback where this has been achieved.

While all GECA ecolabelling standards are voluntary, nevertheless they contain criteria that address compliance with specific laws. In addition, a GECA standard may recognise specific Australian Standards. A prerequisite for certification under the GECA ecolabel is to satisfy the relevant Australian or International Standard, where it is required by law. However, Australian Standards typically define "fit-for-purpose" criteria and usually do not provide assurance of environmental preferability. GECA ecolabelling standards go beyond Australian Standards and define an environmental benchmark for the product category.

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Personal Care Products

DOCUMENT HISTORY

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Versions	Date Published	Summary of Changes
3.1	2007	
4.0	March 2013	Scope, Fitness for Purpose (Demonstrated Fitness), Material Requirements (Palm Oil, VOCs, Colorants, Fragrances, Preservatives and Biocides, Phosphorus, Sodium, Biodegradability), Environmental Claims (Food Safe, Organic, Natural), Hazardous Materials (Dangerous Goods, Banned Substances, Nanoparticles, Chemical UV Absorbers, Limited Substances, Bioaccumlative Substances, Hazardous Substances), Design for Environment (Product Information, Packaging, Waste Minimisation), Social and Legal Compliance.
4.1	May 2014	Amendment: Palm oil, palm kernel oil, packaging, product classification, banned substances and limited substances.
4.1i	July 2014	Update: Addition of explanatory note in Criterion 23. Correction in Criterion 20. Update of 'Definitions and Acronyms' section.

HOW TO APPLY FOR GECA CERTIFICATION

Manufacturers or service suppliers interested in GECA certification using the Environmental Choice Australia Ecolabel are encouraged to read carefully through the entire standard and to evaluate whether their products are likely to conform to the standard and to pass the assessment process.

To launch an application, please contact GECA by phone, email or via the GECA website (www.geca.org.au). The completed application form can be sent to GECA either by mail, fax or email.

After receiving the completed application form and the application fee, GECA refers the verification process to an appointed auditing body. The auditing body contacts the applicant and gives a clear overview of the steps needed to achieve certification for their particular product type.

STRUCTURE OF THE STANDARD

Each section within this standard contains criteria and Demonstration of Conformance (DoC). The criteria state the requirements for the product and applicant company with respect to its environmental performance. The DoCs list the information required to verify compliance to the criteria. Selected sections also contain introductory text which outlines the purpose behind the criteria or the reason for its inclusion in the standard.

REQUESTING ADDITIONAL EVIDENCE

Demonstration of Conformance items are listed for each criterion. The GECA approved auditor/s will request additional information to ensure conformance on a case by case basis. Hence, the conformance items listed below are considered a guide to the minimum Demonstration of Conformance items that will be required from the applicant company.



DEFINITIONS & ACRONYMS

% w/w: Percent weight/weight, equivalent to percent by mass.

ACO: Australian Certified Organic. **ADG:** Australian Dangerous Goods.

Aerobically Biodegradable: A substance that is biodegradable according to AS 4351.

Aerosol: In the context of this standard, refers to products packaged in pressurised cans or cans requiring the use of propellants. Pump or trigger sprays that are not pressurised and do not require the use of propellant are not considered aerosols in this standard.

Anaerobically degradable: A substance that, when measured as directed in ISO 11734 "Water quality - Evaluation of the "ultimate" anaerobic biodegradability of organic compounds in digested sludge - Method by measurement of the biogas production", achieves at least 60 % degradation.

APEO: Alkylphenol ethoxylate and other alkylphenol derivatives.

Aromatic substance: In the context of this standard, aromatic substances are chemicals which contain a planar unsaturated ring of atoms that is stabilized by an interaction of the bonds forming the ring. Such compounds are typified by benzene and its derivatives.

AS: Australian Standard.

ASTM: American Society for Testing and Materials.

Bioaccumulative: A substance is classified as potentially bioaccumulative if the log K_{OW} (log octanol/water partition coefficient) is equal to or greater than 3.

Biodegradable: Organic substances that decompose in the natural environment due to the action of living organisms.

CAS Number: Chemical Abstract Service number. Unique CAS numbers are assigned to chemical compounds as a means of identification.

CAB: Conformity Assessment Body as described by GECA's Scheme Rules. CABs are often referred to as 'auditors', however only GECA appointed auditors may be used to obtain GECA certification.

Carcinogenic: Capable of causing cancer. The International Agency for Research on Cancer is the internationally accepted body for the classification of carcinogenic substances. See http://www.iarc.fr

CI Number: Colour Index Number, as assigned by the Society of Dyers and Colourists and the American Association of Textile Chemists and Colourists.

COD: Chemical Oxygen Demand

Dangerous Goods: Any product classifiable as dangerous according to NOHSC criteria or Code of Practice for Managing Risks of Hazardous Chemicals in the Workplace or Australian Dangerous Goods (ADG) Code, including classification as an Environmentally Hazardous Substance.

Dematerialisation: The reduction of material inputs to increase efficiency of resource use.

Demonstration of Conformance (DoC): Defines sources of evidence acceptable to GECA to demonstrate compliance with criteria of the standard. An applicant manufacturer must provide documentation to the appointed auditing body in order to demonstrate conformance of its products under assessment. For further information on Demonstration of Conformance requirements see *Appendix A - Evidence of Conformance* at the end of this standard.

DID List: Detergents Ingredient Database list, as published by the European Union Ecolabel

EDTA: Ethylene diamine-tetra-acetic acid or ethylene dinitrilo-tetra-acetic acid, or any of its salts or primary derivatives.



Ethanol: Alcohol compound with the molecular formula C₂H₆O. All references to ethanol in this standard refer to pure ethanol only; denatured ethanol (ethanol containing denaturing agents) must not be considered as ethanol in calculations.

EMS: Environmental Management System.

EPA: Environmental Protection Agency, or Environmental Protection Authority.

EPS: Expanded Polystyrene.

Fragrance or Colouring: Organic substances that are added primarily for aesthetic reasons to give colour or smell. Fragrance can also be for the purpose of concealing smells from other ingredients or from the item to be cleaned.

GECA: Good Environmental Choice Australia Ltd.

GEN: Global Ecolabelling Network.

GreenPalm: A certificate trading programme which allows manufacturers to support the sustainable palm oil production.

Halogen: Any element in Group 17 on the periodic table (previously Group VIIA). Halogens include fluorine, chlorine, bromine and iodine.

IARC: International Agency for Research on Cancer.

IFRA: International Fragrance Association.

Impurities/contaminants: Residual products from primary production that can be found in the product/ingredient in concentrations below 0.010% (100 ppm). Substances that are actively added to an ingredient or product for a particular purpose are not considered to be impurities, irrespective of quantity. Substances/products known to be liberated by an ingredient (e.g. formaldehyde and arylamine) are not considered to be impurities or contaminants.

INS Number: International Numbering System for Food Additives Number, as assigned by the Codex Alimentarius of the World Health Organisation and the Food and Agriculture Organisation of the United Nations. Numbers of this system are analogous to those of the E Number system of the European Union.

ISO: International Organisation for Standardization. See http://www.iso.org.

GECA Mark: The Environmental Choice Australia Mark, the mark awarded to applicants complying with GECA ecolabelling standards after assessment by a GECA appointed auditing body.

MEA: Monoethanolamine, also known as ethanolamine.

Mutagenic: A substance that causes mutations or genetic abnormalities.

Nanomaterial: A natural, incidental or manufactured material containing particles, in an unbound state or as an aggregate or as an agglomerate and where, for 50 % or more of the particles in the number size distribution, one or more external dimensions is in the size range 1 nm-100 nm.

NASAA: National Association for Sustainable Agriculture Australia.

NOHSC: National Occupational Health and Safety Commission.

NTA: Nitrilotriacetic acid or any of its salts.

OECD: Organisation for Economic Co-operation and Development.

Organic (chemistry): Carbon compounds other than simple salts such as carbonates, carbon oxides, cyanides and carbides. Unless specified, this definition of organic is applicable to all parts of this standard.

Organic (farming method): Substances or ingredients that have been produced without the use of artificial fertiliser or synthetic chemicals.

Packaging: Materials used for the transport, containment or display of products.

Primary Packaging constitutes the packaging designed to come into direct contact with the product.



- Secondary Packaging (or group packaging) groups a given number of primary packaging units together into a convenient unit at the point of sale. Secondary packaging typically has one of two roles: it can be a convenient means to replenish the shelves; or it can group primary packaging units into a package for purchase. It can be removed without affecting the product's properties, and generally defines the unit handled by the retailer.
- Tertiary Packaging (or transport packaging) is designed to ensure damage-free handling and transport of a number of sales or grouped packages. The term "transport packaging" does not include road, rail, ship or air containers. Transport packaging is normally a shipping unit such as an outer case, a pallet, or a crate.

pH: Formally, pH is defined as the negative log function of the activity of the hydrogen ion in solution. In practice, it is a scale indicating how acidic or alkaline a solution is. A pH of 7 is neutral, higher pH values are progressively more alkaline and lower pH values are progressively more acidic. Each pH unit represents a ten-fold concentration change of the hydrogen ion.

Post-Consumer Material: Post-consumer material is generated by end-users (including households, businesses, industries and institutions) from products that can no longer be used for their intended purpose. Post-consumer material also includes the return of material from distribution chains.

Pre-Consumer Material: Pre-consumer (sometimes also referred to as post-industrial) material is recovered from the manufacturing process before it is sold to end consumers.

Producer / Manufacturer: For the purpose of this standard these terms comprise both manufacturers of a product as well as service suppliers. These may not necessarily be the companies that apply for GECA certification, since certification can also be awarded to retailers of a product. However, for some criteria it is required that the original manufacturer of the product conforms to particular requirements.

Recycled Content: Denotes the proportion of a product that is generated from post-consumer and pre-consumer material.

Readily Biodegradable: Substances which are readily biodegradable according to AS 4351 or relevant OECD method.

Risk Phrases: Risk phrases convey a general description of a hazard, and are depicted as an R followed by a two digit number. More information on risk phrases used in Australia can be found at www.hsis.safeworkaustralia.gov.au/SearchKey#RiskPhrases.

PREP: Packaging Recyclability Evaluation Portal.

RSPO: Round table on Sustainable Palm Oil.

Sensitizer: Any substance that induces a progressively amplified response following continuous or repeated doses of that substance, including substances designated risk phrases R42 and R43.

SDS: Safety Data Sheet (formally Material Safety Data Sheet – MSDS). Contains information relating to the composition, classification and risk assessment of the product. To qualify as suitable, the SDS and information therein must not be more the 5-years old.

Teratogenic: A substance capable of causing heritable genetic damage, producing congenital deformations or causing birth defects.

TGA: Therapeutic Goods Administration.

VOC: Volatile Organic Compounds; any organic compound (compound which contains carbon) with a boiling point below 250°C measured at 101.3kPa. VOC content of products will be calculated according to the content of ingredients that fit this definition.

Note: all percentages described in this document are to be measured as per cent by mass.



BACKGROUND

A GECA product standard sets limits for the most material environmental loads attributable to goods and / or services throughout their life cycle. This particular standard seeks to set an environmental benchmark for Personal Care products. The scope is intended to cover Personal Care products sold in the Australian market. The criteria are used for environmental labelling, implemented by Good Environmental Choice Australia (GECA) as part of the Australian Ecolabelling program. This Standard is voluntary, and after verification, enables certified products to display an environmental label (ecolabel) as implemented by GECA to show the product is environmentally preferable.



STANDARD CATEGORY SCOPE

Criterion 1: This standard is applicable to the following categories of personal care products:

- Liquid and Solid Soaps, including facial washes;
- Shaving Creams and Foams;
- Facial Toners;
- Exfoliants:
- Moisturisers, including facial creams;
- Deodorants, including non-aerosol sprays, sticks and roll-ons;
- Cosmetics:
- Nail Polish and Removers;
- Tanning Lotions;
- Perfumes and Cologne;
- Sunscreen;
- Insect Repellents;
- Personal Hand Sanitizers:
- Oral Hygiene Products;
- Hair Shampoos and Conditioners; and
- Hair Treatments and Styling Products

Other bathroom personal care products related to personal care, hygiene and appearance may also be included in this standard. Other types may be added to the scope at a later date.

Exclusions and Notes

The standard excludes personal care products that are not applied to persons.

Aerosols, including products packaged in pressurised cans or cans requiring the use of propellants, are not accepted for certification. Pump or trigger sprays that are not pressurised and do not require the use of propellant are accepted under this standard.

Single and multi-use wipes and cloths are not covered by this standard.

Products to be used in a commercial sense (e.g. disinfectant or antimicrobial product for use in food preparation areas or medical facilities), and not in a personal care sense, are not covered by this standard.

Demonstration of Conformance

DoC 1.1: Brief description of the product(s) or product range and their purpose as relevant to the standard

DoC 1.2: Explanation of applicability of the product(s) to the scope of this standard.



FITNESS FOR PURPOSE

To be certified, the product(s) must be fit to perform its intended purpose or application. A minimum level of quality and durability is implicit before the GECA ecolabel can be displayed on the product. The applicant must ensure that the product is fit for its intended purpose.

Demonstrated Performance

Criterion 2: The product must demonstrate fitness for purpose or market acceptance or suitability or quality.

If reformulations take place, the applicant must demonstrate that the new formulation also complies with this requirement.

Demonstration of Conformance

DoC 2.1: Independent audit or test reports, or

DoC 2.2: Report from an independent organisation that demonstrates fitness for purpose, market acceptance, suitability or quality, or

DoC 2.3: Report on consumer-based product comparison testing program. This may be conducted internally or externally. The panel must consist of at least ten panellist external to the organization with a neutral position. The efficacy of the product must be compared to and found to be equal or superior that of a comparable market leading product.



MATERIAL REQUIREMENTS

The criteria in this section are intended to address impacts that may occur over the life cycle of a product that can be avoided or mitigated during the design phase of product development.

Unless otherwise stated, the requirements in this section apply to each type of material contained in the finished product regardless of weight.

Palm Oil

Criterion 3: A minimum of 20% of palm oil and palm oil derivatives used in the product must be Roundtable on Sustainable Palm Oil (RSPO) certified (identity preserved, segregated or mass balance) or equivalent, with the remainder required to be offset by 'Book and Claim' system such as GreenPalm, or equivalent. Additionally, applicants must commit to increasing the total percentage of RSPO certified palm oil and palm oil derivatives used in products by 10% each year.

Exemption:

If only chemical derivatives of palm oil are used in the product, it is acceptable to demonstrate sustainability for these through book and claim systems such as GreenPalm in case RSPO certified palm oil derivatives are not available on the market.

Demonstration of Conformance

- **DoC 3.1:** Chain of custody or supply chain evidence and RSPO certification sufficient to cover at least 20% of palm oil and palm oil derivatives used in the product; and
- **DoC 3.2:** GreenPalm certificates sufficient to cover the remaining volume of palm oil and palm oil derivatives used in each product; and
- **DoC 3.3:** Signed declaration from an Executive Officer of the organisation committing to increasing the percentage of RSPO certified palm oil and palm oil derivatives by 10% *per annum*.

Palm Kernel Oil

Criterion 4: The applicant/licensee must make a positive contribution to the production of sustainable and responsibly grown palm kernel oil by either:

- Purchasing, for use in the product, any amount of certified sustainable palm kernel oil (CSPKO) and/or palm kernel oil derivatives that contain or are manufactured using CSPKO; or
- Purchasing all palm kernel oil and palm kernel oil derivatives used in the product, from suppliers that are RSPO members; or
- Ensuring palm kernel oil used in the product is offset by the supplier or the applicant/licensee using a 'Book and Claim' system such as GreenPalm, or equivalent.

Demonstration of Conformance

- **DoC 4.1:** Evidence of any RSPO certified Palm Kernel Oil used; or
- DoC 4.2: Membership certificates or signed declarations from suppliers showing all suppliers are RSPO members; or
- **DoC 4.3:** GreenPalm certificates sufficient to cover the volume of non-certified palm kernel oil and palm kernel oil derivatives used in the product.

Volatile Organic Substances

Criterion 5: The total amount of volatile organic compounds (VOCs) contained in the product must meet the requirements of Table 1, which is based on the functional requirements of each of the different product categories.



Table 1: VOC limits for personal care products

Product Category	Maximum VOC content
Nail polish and nail polish removers	2% weight, as used
Perfume, colognes, toners and personal hand sanitisers	5%* weight, as used
Other liquid formulations (including mouthwash, deodorants, lotions, moisturisers, soaps, shampoos and conditioners)	10% weight, as used
Other solid formulations (including toothpaste, deodorants, cosmetics and soaps)	1% weight, as used

^{*}Ethanol is exempt from the VOC calculation of perfume, colognes, toners, and personal hand sanitisers.

Demonstration of Conformance

DoC 5.1: Calculation of VOC content based on ingredients list. The applicant must provide evidence to the GECA approved auditor to enable this calculation, including full formulation details showing the weight of each ingredient in g/L and the physical properties and chemical formula of each ingredient (or SDS for each ingredient). All ingredients qualifying as VOCs according to the definition in this standard will contribute to the VOC calculation, unless addressed above in the criterion.

Fragrances

Criterion 6: Fragrance must be produced and used in accordance with the "Code of Practice" compiled by the International Fragrance Association (IFRA), available at http://www.ifraorg.org/en-us/code_of_practice_1.

Demonstration of Conformance

DoC 6.1: The applicant must provide a declaration signed by the manufacturer(s) of all fragrances used which states that the fragrance was produced in accordance with the IFRA Code of Practice. This may be supported by evidence of the manufacturer's membership to IFRA.

Colorants

Criterion 7: Colorants used must be included on the "List of Colouring Agents Allowed for use in Cosmetic Products" in Annex IV of the European Union Commission Directive 76/768/EEC. A copy of the Directive is available at http://ec.europa.eu/enterprise/cosmetics/html/consolidated dir.htm

OR

Colours must be approved for use in foods under Australian Food Standard 1.3.1, schedule 1, 3 or 4. This can be found at http://www.comlaw.gov.au/Series/F2008B00614.

Demonstration of Conformance

DoC 7.1: Full list of all colorants used, identified by chemical name, CAS number, and where applicable CI (colour index) number or INS (International Numbering System for food additives) number.

Preservatives and Biocides

Criterion 8: Substances with no recognised function other than biocidal activity may be added for preservation purposes only. Materials added for preservation purposes will be used at the minimal concentration which provides the required function.

Preservatives must be listed and abide by the restrictions outlined in the EU Cosmetics Directive 76/768/EEC, which can be found at

http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:1976L0768:20100301:en:PDF.

Demonstration of Conformance

DoC 8.1: Full ingredients list; and

DoC 8.2: Documentation detailing preservation requirements of the product and concentrations of preservatives used.



Criteria 9, 10, 11 and 12 only apply to products which are in contact with the body for a short time before rinsing off with water and / or entering wastewater systems.

This includes liquid and solid soaps, shaving creams and foams, shampoos and conditioners, toothpastes and mouthwashes.

Phosphorus and Phosphates

Criterion 9: The product must not be manufactured using phosphorus, phosphorus compounds, phosphates or phosphate derived ingredients.

Trace amounts of phosphorus must not exceed 0.05% w/w excluding water.

Demonstration of Conformance

DoC 9.1: Full ingredients list for each product; and

DoC 9.2: Declaration of the trace amount of phosphates contained in the product and supporting documentation such as a Total Phosphorus Test, factors influencing test results including dilution and calculations to find the amount of phosphorus w/w from these results.

Sodium

Criterion 10: Products must not contain more than 5% w/w sodium, excluding water content.

Demonstration of Conformance

DoC 10.1: Full ingredients list for each product

Biodegradability

Criterion 11: All surfactants and organic ingredients must be readily biodegradable according to AS 4351, relevant OECD tests, or shown on the most recent DID List (Part A), found at

http://ec.europa.eu/environment/ecolabel/documents/did_list/didlist_part_a_en.pdf, as readily biodegradable (R)

In the case that numerous ingredients are not reported on the DID list, the product may be tested as a whole to AS 4351 or a relevant OECD test.

Demonstration of Conformance

DoC 11.1: Test report based on AS 4351 or relevant OECD test for each surfactant or organic ingredient not included in the DID list, or

DoC 11.2: Test report based on AS 4351 or relevant OECD test for the product as a whole.

Criterion 12: All surfactants used in the product must be anaerobically biodegradable according to ISO 11734 or shown on the most recent DID List (Part A), found at:

http://ec.europa.eu/environment/ecolabel/documents/did_list/didlist_part_a_en.pdf, as anaerobically biodegradable (Y).

Demonstration of Conformance

DoC 12.1: Test report based on ISO 11734 for each surfactant not included in the DID list.



ENVIRONMENTAL CLAIMS

Environmental claims are one of the tools utilised by consumers when attempting to make environmentally preferable choices and therefore it is essential that such claims are true and substantiated.

All claims must be relevant to the product and verifiable to GECA or a GECA appointed auditor.

Food Safe

Criterion 13: Products that declare "food safe" claims, or similar, must be able to provide evidence of formal recognition of this claim by Food Standards Australia and New Zealand.

Demonstration of Conformance

DoC 13.1: Documentation showing approval by Food Standards Australia and New Zealand.

Organic

Refer to the 'definitions and acronyms' section of this standard for further understanding on the different meanings of organic in the context of this criterion.

Criterion 14: Products that declare "Organic", or similar, must contain at least 95% ingredients certified as organic by Australian Certified Organic (ACO), Organic Growers of Australia, National Association for Sustainable Agriculture Australia (NASAA) Certified Organic or Demeter Certified Biodynamic.

Products that claim to contain "Organic Ingredients", or similar, shall only claim ingredients as organic if certified by one of the above bodies. Ingredients certified as organic by one of the above bodies shall be identified as so on the label of the product.

Demonstration of Conformance

DoC 14.1: For products which claim to be organic, or similar, the applicant must provide evidence of organic certification for ingredients making up at least 95% of the product

DoC 14.2: For products which claim to contain organic ingredients, the applicant must ensure the label identifies which ingredients are organic and provide evidence of organic certification for these ingredients.

Natural

Criterion 15: Products will not claim to be "Natural". Products may display claims such as 'contains plant-derived ingredients', if these claims can be verified, and the plant-derived substance is not mixed or substituted wholly or partly with a synthetic analogue at any time including periods of limited supply.

Demonstration of Conformance

DoC 15.1: Documentation showing absence of such claims.

Not Tested on Animals

Criterion 16: Products that declare they are "Not Tested on Animals" or similar must be able to provide evidence of formal recognition of this claim by an independent organization such as PETA or Choose Cruelty Free.

Demonstration of Conformance

DoC 16.1: Documentation showing approval by an appropriate, independent organization.



Therapeutic Claims

Criterion 17: Products that declare therapeutic claims or similar must be able to provide evidence of formal recognition of this claim by the Therapeutic Goods Administration.

Demonstration of Conformance

DoC 17.1: Documentation showing approval by the Therapeutic Goods Administration.

Other Claims

Criterion 18: Other environmental claims shall be verifiable by GECA citing, as a minimum, appropriate test results from an independent laboratory in accordance with an internationally recognised relevant test method.

Demonstration of Conformance

DoC 18.1: Test report showing results and test method used.



HAZARDOUS MATERIALS

Personal care products may contain substances that are hazardous to humans or the environment. Today's market expects environmental products to be non-toxic to human health through regular correct use. The criteria in this section are aimed at eliminating hazardous chemicals, thereby minimising risks to human health and the environment.

Dangerous Goods

Criterion 19: The product as used must not be classifiable as hazardous according to Safe Works Australia (SWA) criteria*. Ultra-concentrates may be classified as irritants.

The product as supplied and as used must not be classifiable as dangerous according to NOHSC criteria or Code of Practice (CoP) for Managing Risks of Hazardous Chemicals in the Workplace or Australian Dangerous Goods (ADG) Code, including classification as an Environmentally Hazardous Substance. This includes substances with a potentially corrosive pH (below 2 and above 11.5) and substances carrying R34 or R35.

Perfume, colognes, toners and personal hand sanitisers are exempt from this criterion if the product is classified on basis of flammability.

*The product can be classified either in accordance with the *Approved Criteria for Classifying Hazardous Substances* [NOHSC:1008(2004)] or in accordance with the *Globally Harmonised System of Classification and Labelling of Chemicals.*

Demonstration of Conformance

DoC 19.1: An accurate and current SDS for each product; and

DoC 19.2: If available, any documentation supporting the product's classification as hazardous / non-hazardous or dangerous / not dangerous according to NOHSC, SWA / WHS or ADG criteria.

Banned Substances

Criterion 20: Certified products must not contain any ingredient that is classified as a known or suspected endocrine disruptor, mutagen or teratogen, or reported to exert effects on the respiratory tract, skin or digestive system.

The product must not contain any substances carrying any of the following classifications.

R20 (H332), R21 (H312), R22 (H302), R23 (H331), R24 (H311), R25 (H301), R26 (H330), R27 (H310), R28 (H300)

R33 (H372, H373), R34 (H314), R35 (H314), R36 (H319), R37 (H335), R38 (H315), R39 (H370)

R40 (H351), R41 (H318), R42 (H334), R43 (H317), R45 (H350), R46 (H340), R48 (H372,H373), R49 (H350)

R60 (H360), R61 (H360), R62 (H361), R63 (H361), R64 (H362), R65 (H304), R66 (AUH066), R67 (H336), R68 (H344 H374)

R68 (H341,H371)

EU C/M/R; IARC Group 1* and 2A

*Ethanol is classed by IARC as a Group 1 carcinogen in the context of alcoholic beverages. This ruling is not considered relevant to the product categories covered by this standard. Therefore, ethanol will not be considered carcinogenic based on this information.

Preservatives and biocides, as defined by criterion 7, are exempt from this criterion up to a concentration of 1% by weight. Hydrogen peroxide is exempt from this criterion if the concentration in the final product is equal to or less than 5% by weight.

Exemptions may be granted for a specific substance classified with R20, R21, R22, R36, R37, R38, R41, R66, R67 provided that:

- the product is not intended for facial, oral or intimate hygiene applications, or for use on infants
- there is justification for the substance to be present in the product
- the overall product is not classified with any of these R-phrases.



Demonstration of Conformance

DoC 20.1: Full ingredients list, stating chemical names and CAS numbers; and

DoC 20.2: SDS for each ingredient.

Criterion 21: Nanomaterials will not be added to the product.

Demonstration of Conformance

DoC 21.1: Declaration signed by the manufacturer stating that no nanomaterials are used in the product formulation.

Criterion 22: Chemical UV absorbers will not be added to the product.

Demonstration of Conformance

DoC 22.1: Declaration signed by the manufacturer stating that no chemical UV absorbers are used in the product formulation.

Criterion 23: The product, and its ingredients, must not contain the following substances

- Aluminium and aluminium compounds;
- APEO and other alkylphenol derivatives (excluding phenoxyethanol);
- Aziridine or polyaziridines;
- Butoxyethanol;
- Formaldehyde or formaldehyde donors;
- Quaternary ammonium compounds that are not readily biodegradable, monoethanolamine (MEA) and triethanolamine (TEA);
- Halogens and halogenated compounds*, including reactive chlorine compounds (e.g., hypochlorites), organic chlorine carriers (e.g. triclosan), and benzalkonium chloride;
- Heavy metals** including antimony (Sb), arsenic (As), cadmium (Cd), chromium (Cr), cobalt (Co), lead (Pb) mercury (Hg), and tin (Sn);
- Optical brighteners;
- Parabens:
- Phthalates;
- Selenium and selenium compounds;
- The chelating agents EDTA, DTPA, NTA or phosphonates;
- The following fragrances: Moskusxylene (81-15-2), Moskusambrette (83-66-9), Moskene (116-66-5), Moskustibetin (145-39-1), and Moskusketone (81-14-1);
- Xylene sulfonates or other linear alkyl benzene sulfonates.

- For products intended for eyes, lips, oral or intimate hygiene applications, or for use on infants: the total heavy metal concentration does not exceed 10ppm with the following individual limits: Lead: 1 ppm; Arsenic: 0.5 ppm; Cadmium: 0.1 ppm; Mercury: 0.2 ppm; Antimony: 0.5 ppm.
- For all other products: the total heavy metal concentration does not exceed 25ppm with the following individual limits: Lead: 10 ppm; Arsenic: 2 ppm; Cadmium: 3 ppm; Mercury: 1 ppm; Antimony: 5 ppm.

Contaminants/impurities are defined in the 'Definitions and Acronyms' section.

^{*}Sodium chloride is exempt from this criterion. Additionally, fluoride compounds for use in oral hygiene products are exempt from this criterion.

^{**}Trace amounts of heavy metals present as contaminants or impurities in raw materials or component substances are exempt from this criterion if the following requirements are met:



Demonstration of Conformance

DoC 23.1: Signed declaration from an Executive Officer of the applicant company which confirms that the listed chemicals are not used as ingredients and are not contained in the ingredients used.

DoC 23.2: Full ingredients list, stating chemical names and CAS numbers; and

DoC 23.3: SDS for each ingredient, and relevant test reports where applicable.

Limited Substances

Criterion 24: The product must not contain more than 1% by weight of any substance that carries one or more of the following risk phrases: IARC Group 2B*

* Titanium dioxide is excluded from this restriction when used as a pigment in cosmetics only (excluding sunscreens).

Additionally, products which are intended to be immediately rinsed off with water must not contain more than 1% by weight of any substance that carries one or more of the following risk phrases: R50 (H400), R50/53 (H410), R51/53 (H411), R52/53 (H412), R53 (H413).

Exemption: Surfactants in concentration <25% are exempt if the 1% limit was based only on a R50 (H400) classification.

Demonstration of Conformance

DoC 24.1: Full ingredients list, stating chemical names and CAS numbers; and

DoC 24.2: SDS for each ingredient.

Criterion 25: Zinc oxide may only be used in sunscreen products, and at a maximum concentration of 23% by weight.

Demonstration of Conformance

DoC 25.1: Full ingredients list, stating chemical names and CAS numbers; and

DoC 25.2: SDS for the final product.

Bioaccumulative Substances

Criterion 26: The product must not contain any substances which are deemed to be potentially bioaccumulative. A substance is classified as potentially bioaccumulative if the log K_{OW} (log octanol/water partition coefficient) is equal to or greater than 3.

Demonstration of Conformance

DoC 26.1: Test reports using relevant methods, such as OECD 107 or OECD 117.



DESIGN FOR ENVIRONMENT

The criteria in this section are intended to address some of the major factors of a product that can be anticipated in sustainable design and are more easily incorporated during the design phase of product development.

Product Information

Product information allows customers to use the products in a responsible and sustainable manner.

Criterion 27: Suitable information must be supplied with the product or made available to the public.

Information that must be included on the label includes

- Instructions for correct use including dilution measures if applicable.
- All hazards associated with the product, its use, storage or disposal
- Complete ingredients listing, according to the Trade Practices (Consumer Product Information Standards) (Cosmetics) Regulation 1991, available at www.comlaw.gov.au/Details/F2008C00244.
- Use by date.

Information that must be available to the public includes

- Safety data sheet (SDS)
- Technical data sheets or product information sheets
- Environmentally responsible use and disposal instructions including details of product stewardship arrangements

Where the product is not physically present at the point of purchase (eg. when purchased online), the full ingredients list must be made available.

Demonstration of Conformance

DoC 27.1: Copy of labels, care instructions and other information provided with the product.

DoC 27.2: A current material safety data sheet for each product, and

DoC 27.3: Technical data sheets, web pages and any other information freely available to customers and/or the public.

Packaging

Criterion 28: Packaging must comply with at least one of the following:

- Each material constituting >20% by weight of the total primary and secondary packaging used, must contain at least 50% recycled content by weight;
- Each material constituting >20% by weight of the total primary and secondary packaging used, must be derived from plant-based materials (e.g. PLA plastics);
- Each material constituting >20% by weight of the total primary and secondary packaging used, must be compostable to a relevant ASTM or ISO standard;
- Each material constituting >20% by weight of the total primary and secondary packaging used, must be biodegradable to a relevant ASTM or ISO standard such as ASTM D5511; or
- Packaging (primary and secondary) must be assessed using the Australian Packaging Covenant's
 Packaging Recyclability Evaluation Portal (PREP)1. Each separable item constituting >20% by weight of the
 total primary and secondary packaging, must be classified as Recyclable under the Item Assessment Result
 of the PREP Assessment Report.

¹www.prep.org.au



Paper and cardboard packaging must be either certified under recognised forest certification scheme (e.g. FSC or PEFC) or contain at least 30% recycled content by weight.

Material used for the transport of products (tertiary packaging) and whose disposal is not the responsibility of the end consumer may be exempt from the above requirements if they are re-used by the applicant, or are recyclable in specialist recycling facilities.

Refill packaging aimed to minimise material usage is exempt from this criterion.

Demonstration of Conformance

DoC 28.1: Details of materials used in the product and their manufacture, including information on the input of recycled and virgin materials reported by weight if applicable. The recycled content can be averaged over a 12-month period to find the amount or range of recycled content; and /or

DoC 28.2: Copy of PREP Assessment Report; and/or

DoC 28.3: Evidence of certification under relevant forest certification scheme; and/or

DoC 28.4: Details of re-use programs for transport materials within the applicant company.

Criterion 29: Packaging must not be halogenated.

Demonstration of Conformance

DoC 29.1: Information regarding composition of packaging materials including chemical names, CAS numbers and/or SDS where applicable.

Criterion 30: All plastic bottles and other major or primary packaging must be marked with a plastics identification code. It is not mandatory for small components including caps and pump-spray nozzles to be marked.

Packaging made from PLA plastic must be labelled with the following instructions for disposal: "This packaging is made of PLA plastic. Please dispose of in a municipal organic waste stream."

Demonstration of Conformance

DoC 30.1: Visual inspection of each plastic component of the packaging.

Criterion 31: Packaging must not be pressurised or require the use of propellants.

Demonstration of Conformance

DoC 31.1: Signed declaration from an Executive Officer of the manufacturing company, stating that the packaging is not pressurised and does not require the use of propellants.



Waste Minimisation

Reducing total waste reduces the generation of hazardous waste, encourages reduced consumption of resources through dematerialisation and increases production efficiency.

Criterion 32: The applicant must demonstrate that at least 97% of material inputs (ingredients) result in product and that effective waste management / material efficiency policies and procedures are developed and implemented, including:

- Waste minimisation policies and procedures to reduce the amount of waste generated;
- Waste recovery procedures to capture and reuse as much waste as is practical;
- Efficient use of resources through dematerialisation; and
- Energy conservation policies to reduce energy consumption.

Demonstration of Conformance

DoC 32.1: Documentation of all material inputs and outputs on an annual (12-month) basis. At a minimum the calculation will be based on the weight of input ingredients *versus* the weight of resultant product; however, the most appropriate method will be determined by a GECA appointed auditor. The calculation may include process information and waste recapture methods as necessary; and

DoC 32.2: Demonstrate progress on developing, implementing and adhering to effective resource minimisation policies and procedures as detailed above. This may include documentation of programs which aim to reduce or reuse waste; dematerialise or use fewer raw materials (e.g. reduced paper usage); or conserve or use alternate sources of energy or purchase green power.



SOCIAL AND LEGAL COMPLIANCE

This section addresses compliance with law and the societal attributes of the manufacturer and the applicant company. Criteria for social aspects of the product are required under the international standard on ecolabelling (ISO 14024), and this section is common to all GECA standards. Equivalent sections are included in standards of all other GEN member ecolabelling bodies around the world. The social aspect partially addresses the third dimension of sustainability - Society. This was first understood by manufacturers under the name Corporate Social Responsibility (CSR). In this standard social criteria include laws for equal opportunity, safety and protection of workers. GECA certification cannot be given to any company that illegally exploits workers or their families.

Environmental Legislation

Criterion 33: The manufacturer(s) of the product and the applicant company are required by law to comply with relevant environmental legislation and government orders at the Local, State and Commonwealth levels (if these have been issued). Where a manufacturer is from an overseas jurisdiction, it is that jurisdiction's environmental regulations that apply. Where the manufacturer has been found guilty of a breach of any environmental legislation or permit(s) within the last 2-years there must be evidence of corrective action.

Demonstration of Conformance

DoC 33.1: Signed declaration from an Executive Officer of the organisation stating compliance to environmental legislation and government orders; as well as declaration of any breaches of environmental legislation or permits and the date of the breach. Applicant must:

- provide a Legal Register listing applicable environmental legislation (including applicable Regulations under that legislation) in, or as an attachment to, this declaration. The Legal Register must, for each applicable Act and Regulation listed, state whether the manufacturer and applicant company comply; or
- have a certified ISO 14001, Eco-Management and Audit Scheme (EMAS) or equivalent environmental management system in place; and

DoC 33.2: Any relevant permits granted by the EPA or an equivalent national body; and

DoC 33.3: Evidence of corrective action following a guilty verdict, if applicable.

In this criterion, 'Regulation' means an entire regulatory instrument (for example, the Environmentally Hazardous Chemicals Regulation 2008) and not the individual sections, provisions or clauses of a regulatory instrument.

Fair Pay

Criterion 34: All employees must be covered by a Federal or State award; a certified industrial agreement or a registered agreement as determined by the Australian Government Workplace Authority, or a State or Territory Workplace Relations Agency; or a workplace agreement in compliance with Workplace Relations Act 1996 Part 7 - The Australian Fair Pay and Conditions Standard. Where a manufacturer is from an overseas jurisdiction, it is that jurisdiction's equivalent regulations that apply.

Demonstration of Conformance

DoC 34.1: Signed declaration of compliance from an Executive Officer of the organisation;

DoC 34.2: Text or template of a typical workplace agreement offered to employees of the company; and

DoC 34.3: Sample payslips.



Workplace Safety

Criterion 35: A manufacturer / applicant company must demonstrate general compliance with State or Territory Legislation concerning Occupational and Workplace Health and Safety and / or the Commonwealth Safety, Rehabilitation and Compensation Act 1988, where applicable. Where a manufacturer is from an overseas jurisdiction, it is that jurisdiction's equivalent regulations that apply. Where a manufacturer / applicant company has been found quilty of a breach of relevant legislation within the last 2-years, there must be evidence of corrective action.

Demonstration of Conformance

DoC 35.1: Signed declaration from an Executive Officer of the organisation stating compliance to workplace legislation and government orders, as well as declaration of any breaches of legislation and the date of the breach. Applicants must list all applicable legislation in, or as an attachment to, this declaration;

DoC 35.2: Copy of the company Occupational / Workplace H&S policy and procedures;

DoC 35.3: Copy of employee induction records, training records, meeting records and risk assessments; or current OHSAS 18001, AS/NZS 4801 or equivalent certification; or third party certification stating compliance to OH&S Act 2004 and the OH&S Regulations 2007 or equivalent jurisdiction specific legislation; and

DoC 35.4: Evidence of corrective action following a guilty verdict, if applicable.

Equal Opportunity

Criterion 36: The manufacturer and / or applicant company must demonstrate general compliance with the requirements of the Racial Discrimination Act 1975, Sex Discrimination Act 1984, Disability Discrimination Act 1992, Equal Opportunity for Women in the Workplace Act 1999 and complementary State Legislation. The manufacturer cannot be in the list of 'named' or non-compliant employers under the Equal Opportunity for Women in the Workplace Act 1999. Where a manufacturer / applicant company is from an overseas jurisdiction, it is that jurisdiction's equivalent regulations that apply. Where a manufacturer has been found guilty of a breach of relevant legislation within the last 2-years, there must be evidence of corrective action.

Demonstration of Conformance

DoC 36.1: Signed declaration of compliance from an Executive Officer of the organisation;

DoC 36.2: Copy of relevant company policies and procedures;

DoC 36.3: Evidence of corrective action following a guilty verdict, if applicable; and

DoC 36.4: The auditor will verify that the company does not appear on the following list: www.wgea.gov.au/report/compliance

Lawful Conduct

Criterion 37: The manufacturer / applicant company must not have been convicted of any breach of criminal law, any breach of the Trade Practices Act 1974 or the Corporations Act 2001, including prosecution or de-listing by the Australian Stock Exchange (ASX) or international equivalent. Where a manufacturer is from an overseas jurisdiction, it is that jurisdiction's equivalent regulations that apply. Where a manufacturer has been found guilty of a breach of relevant legislation within the last 2-years, there must be evidence of corrective action.

Demonstration of Conformance

DoC 37.1: Signed declaration from an Executive Officer of the organisation; and

DoC 37.2: Evidence of corrective action following a guilty verdict, if applicable.



EVIDENCE OF CONFORMANCE

Demonstration of Conformance (DoC)

This section lists the sources of evidence which may be considered during an audit to establish conformance against GECA's standards. This list is provided in order to guide the applicant manufacturer through the requirements of the standard and to facilitate the preparation of an application.

The DoC requirements as specified, along with each criterion in the standard, define specific sources of evidence acceptable to GECA. In cases where criteria offer several DoC requirements, it is the sole decision of the GECA appointed CAB to choose the appropriate option in the preliminary stage of the assessment. Where specific standards or test methods are required, it is intended that the most recent version of the applicable standard or method is used. If none of the recommended DoC requirements stipulated for a particular criterion in the standard is applicable for a product under assessment, then the GECA appointed CAB may choose an alternative but equivalent source of evidence. In cases where alternative sources of evidence are accepted for the verification of the product, the GECA appointed CAB will inform GECA by providing a report on the details as far as appropriate. GECA will use this information to continuously improve the DoC requirements stipulated by each standard.



APPENDIX A APPLICATION CHECKLIST

The Application Checklist is intended to guide the applicant company through the application and verification process. The company may collect all the information that is required for the verification of the product and attach the relevant documents to their application. The table below summarises the DoC requirements for each criterion in the standard.

Criterion Number	Criterion Content	Demonstration of Conformance See standard body for details	Evidence Attached	Complies Y/ N or NA
Standard Catego	ory Scope			
Criterion 1	Soaps, shaving creams and foams, facial toners, exfoliants, moisturisers, deodorants, cosmetics, nail polish and removers, tanning lotions, perfumes, sunscreen, insect repellent, personal hand sanitizers, oral hygiene products, hair shampoos and conditioner, hair treatment and styling products	Brief description of the product (range).		
Fitness For Purp	oose			
Criterion 2	Demonstrated performance	Independent audit or test results; or report which demonstrates fitness; or report on consumer-based product comparison testing.		
Palm Oil				
Criterion 3	RSPO certified	RSPO certification for at least 20% of palm oil and derivatives used.		
		GreenPalm or equivalent certificates to cover remaining volume.		
		Declaration to increase percentage of RSPO certified palm oil and derivatives by 10% per annum.		
Palm Kernel Oil				
Criterion 4	Contribution to sustainable and responsible production	RSPO certification; or		
		Membership certificates or signed declarations from suppliers showing all suppliers are RSPO members; or		
		GreenPalm or equivalent certificates to cover volume of non-certified palm kernel oil used.		
Volatile Organic	Compounds			
Criterion 5	VOC content	Calculation of VOCs based on ingredients.		



Criterion Number	Criterion Content	Demonstration of Conformance See standard body for details	Evidence Attached	Complies Y/ N or NA
Fragrances			I	I
Criterion 6	Compliance with IFRA	Declaration signed by manufacturer stating compliance		
Colorants				1
Criterion 7	Compliance with EU Directive 76/768/EEC or approved for use in foods under Australian Food Standard	Full list of colorants used		
Preservatives	and Biocides	1	1	1
Criterion 8	Preservatives must be listed and abide by the restrictions outlined in the EU Cosmetics Directive 76/768/EEC	Full ingredients list, preservation requirements, and concentrations used		
Phosphorus			1	1
Criterion 9	Compounds banned	Full ingredients list for each product		
		Declaration of trace amounts of phosphates		
Sodium				
Criterion 10	Sodium limits (5% w/w)	Full ingredients list		
Biodegradabi	lity			
Criterion 11	Aerobic ready biodegradability	Test reports using AS 4351 or OECD requirements where applicable, or shown on the most recent DID List (Part A)		
Anaerobic Bi	odegradability			
Criterion 12	Surfactant anaerobic biodegradability	Test reports using ISO 11734 where applicable		
Food Safe		·	1	•
Criterion 13	Food safe claims	Approval by FSANZ		
Organic			1	1
Criterion 14	Organic claims	Evidence of organic certification		
Natural	•	•	1	1
Criterion 15	No "natural" claims	Evidence of absence of claim		
Not Tested or	n Animals	•	1	
Criterion 16	"Not tested on animals" declarations on product	Documentation showing approval by an appropriate, independent organization		



Criterion Number	Criterion Content	Demonstration of Conformance See standard body for details	Evidence Attached	Complies Y/ N or NA
Therapeutic (Claims		l	
Criterion 17	Therapeutic claims	Documentation showing approval by TGA		
Other Claims				
Criterion 18	Other environmental claims	Test reports and method used		
		Authority requirements and test results		
Dangerous G	oods			
Criterion 19	Product classification	SDS for each product		
		Documentation supporting classification		
Banned Subs	tances	·	•	•
Criterion 20	Endocrine disruptors, carcinogens,	Full ingredients list		
	mutagens, teratogens, or compounds with effects on the respiratory tract, skin or digestive system	SDS for each ingredient		
Criterion 21	No nanomaterials	Declaration signed by the manufacturer		
Criterion 22	No chemical UV absorbers	Declaration signed by the manufacturer		
Criterion 23	Harmful substances	Statement of conformance signed by Executive Officer		
		Full ingredients list		
		SDS for each ingredient and relevant test reports where applicable		
Limited Subs	tances			
Criterion 24	Limited substances	Full ingredients list		
		SDS for each ingredient		
Criterion 25	Zinc oxide restrictions	Full ingredients list		
		SDS for each ingredient		
Criterion 26	Bioaccumulative substances	Relevant test reports		
Product Infor	mation			
Criterion 27	Information available to public	Copy of labels and instructions		
		SDS for each product		
		Information available to public		1



Criterion Number	Criterion Content	Demonstration of Conformance See standard body for details	Evidence Attached	Complies Y/ N or NA
Packaging			L	L
Criterion 28	Packaging requirements	Details of materials used in product		
		Test reports under relevant method, Copy of PREP Assessment Report, and/or evidence of certification under relevant forest certification scheme		
		Details of re-use programs for transport materials or specialist recycling programs		
Criterion 29	Halogenation	Information regarding packaging materials		
Criterion 30	Plastic ID codes	Visual inspection of packaging		
Criterion 31	Pressurised packaging	Statement of conformance signed by Executive Officer		
Waste Minimisa	ation			
Criterion 32	Waste minimisation policies	Documentation of material flows		
		Reports on waste minimisation strategies		
Environmental	Legislation			
Criterion 33	Applicable environmental legislation and government orders	Statement of conformance signed by EO, with declaration of breaches and applicable legislation and Legal Register listing applicable environmental legislation or certified environmental management system in place		
		Applicable permits granted by EPA		
		Evidence of corrective action (if applicable).		
Fair Pay				
Criterion 34	Coverage of employees under certified agreements	Statement of conformance signed by Executive Officer		
		Sample workplace agreement		
		Sample payslips		
Criterion	Criterion Content	Demonstration of Conformance	Evidence	Complies Y/ N or



Number		See standard body for details	Attached	NA
Workplace Saf	ety			
Criterion 35	Compliance with state or territory legislation	Statement of conformance signed by EO, with declaration of breaches and applicable legislation		
		Copy of Occupational and Workplace H&S policies and procedures		
		Copy of employee induction, training, and meeting record and risk assessments; or current OHSAS 18001, AS/NZS 4801 or equivalent certification; or other third party certification		
		Evidence of corrective action (if applicable)		
Equal Opportu	nity	•	•	
Criterion 36	Racial Discrimination Act, Sex Discrimination Act, Disability Discrimination Act, Equal Opportunity for Women in the Workplace Act and complementary State Legislation and Regulations.	Statement of conformance signed by Executive Officer		
		Copy of relevant policies and procedures.		
		Evidence of corrective action (if applicable)		
		Does not appear on list of non-compliant organisations		
Lawful Conduc	t			
Criterion 37	No breaches of Trade Practices Act or Corporations Act.	Statement of conformance signed by Executive Officer		
		Evidence of corrective action, if applicable		