

Guidance Note on Formulation Variations

Date: March 2021

Supersedes: March 2020

Revision date: March 2022

Applications to the Accord 'Recognised – Environmental Credentials Scheme' are made in respect to a Formulation, with all Brands sharing that Formulation covered by the one Application.

Advice on the variation to a Formulation that is permissible under an existing Licence, and regarding when a new application is required, is set out in this Guidance Note.

Information on minor variations to existing formulations

A minor variation to a Formulation that has already been approved under the Recognised Scheme may not require a separate technical assessment.

Colorant: If the variation is to the concentration and/or type of colorant and the colorant is present at < 0.1% in the Formulation concentrate, and included on the approved lists or standards below, the variation is considered minor and the Formulation does not require a separate technical assessment.

Approved colorant lists/standards:

- Commission Regulation (EU) No. 1129/2011, Annex II, Part B (<https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32011R1129>)
- Food Standards Australia New Zealand (FSANZ) in Australia New Zealand Food Standards Code – Schedule 16 – Types of substances that may be used as food additives (<https://www.legislation.gov.au/Details/F2019C00128>)

Fragrance: If the variation is to the concentration and/or type of fragrance and the fragrance is present at < 0.1% in the in-use Formulation (at its most concentrated dilution), and included on the approved lists below, the variation is considered minor and the Formulation does not require a separate technical assessment.

Approved fragrance lists/standards:

- Research Institute for Fragrance Materials (RIFM) Database (www.rifm.org/)
- The IFRA list of fragrance ingredients (<https://ifrafragrance.org/initiatives/transparency/ifra-transparency-list>)

% Ingredient decrease: If the variation is to decrease the percentage of an ingredient, with the entirety of the percentage decrease being substituted by water (i.e. no increase to the percentage/s of any ingredient/s other than water), the variation is considered minor and the Formulation does not require a separate technical assessment.

Brand name: If the variation is to the brand name only, the variation is considered minor and the Formulation does not require a separate technical assessment.

Packaging: If the variation is to the packaging, with the replacement packaging meeting the requirements of Section 6.2.9 of the Standard Criteria, the variation is considered minor and the Formulation does not require a separate technical assessment.

If, following review of this Guidance Note, the Applicant determines that the new formulation qualifies as a minor variation, no further third-party assessment is required. The Applicant should submit the Variation Certification Form to Accord, which confirms the product meets the minor variation criteria listed above.

Please refer to the flowchart on page 3 for further guidance on the decision process for minor formulation variations.

Information on potentially inconsequential variations to existing formulations

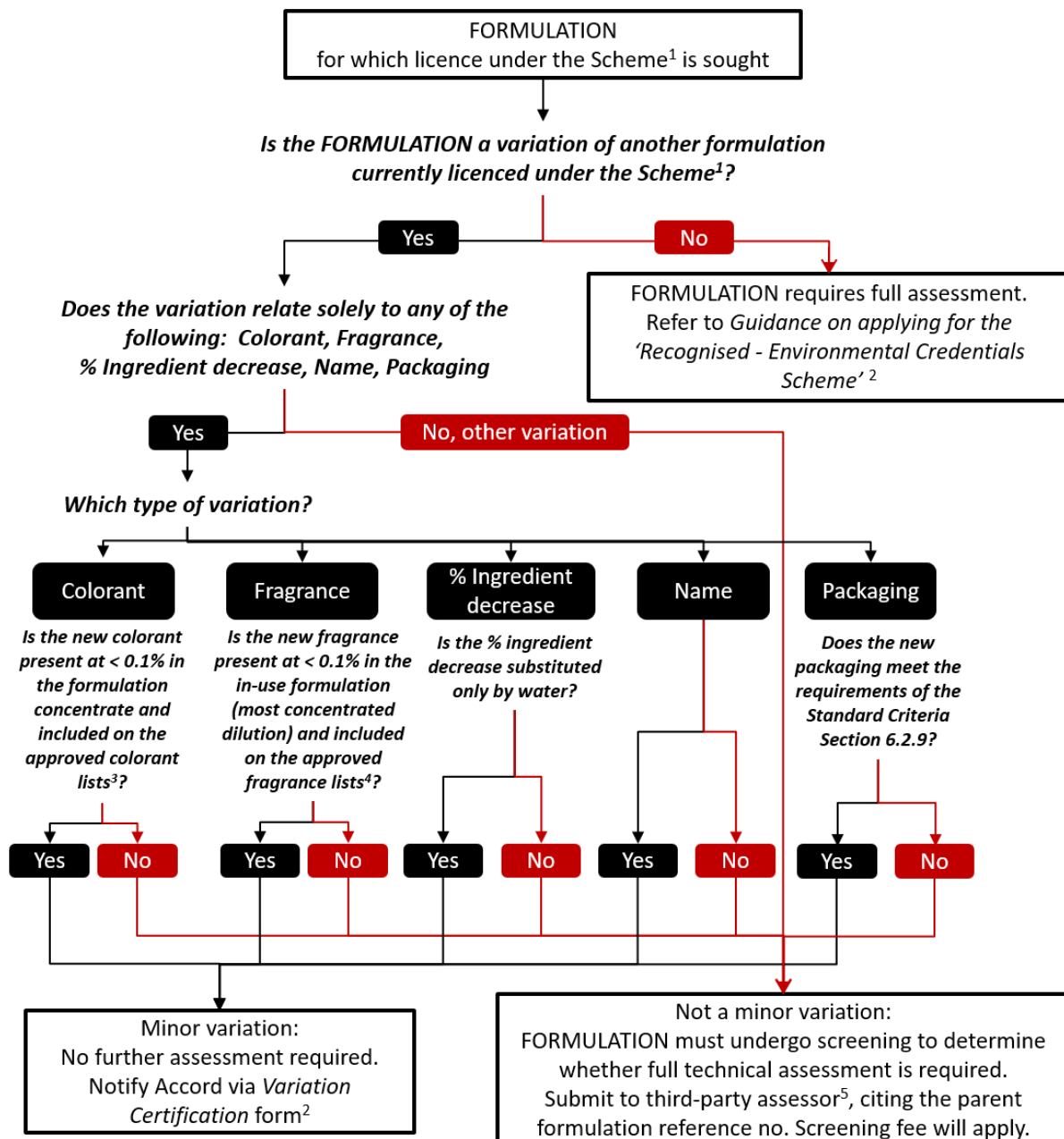
Formulation variations that are different to the above may also not require a full technical assessment. If an application does not meet the definition of a minor variation according to this Guidance Note, but the applicant considers the variation to be inconsequential then an application (citing the parent formulation reference number) may be submitted to the third-party assessor for determination of inconsequentiality.

An inconsequential variation will generally consist of a small change in the formulation that does not affect the product's safety to humans or the environment, or ability to comply with the defined criteria for the 'Recognised – Environmental Credentials Scheme'.

Formulations which introduce a new ingredient at concentrations > 0.1% or increase concentrations of existing product ingredients by more than a few per cent may not be inconsequential changes.

The third-party assessor will determine whether the variation between the formulations is considered consequential or inconsequential. If the variation is found to be inconsequential, no further assessment is required, and a screening fee will be applied. If the variation is found to be consequential, the application requires a full Technical Assessment for which the Screening and Technical Assessment fees will apply.

Please refer to the flowchart on page 3 for further guidance on the decision process for potentially inconsequential formulation variations.



Decision flowchart for Formulation variations

1. Scheme – ‘Recognised – Environmental Credentials Scheme’ for commercial cleaning products
2. Available at www.accord.asn.au/sustainability/recognised/recognised-documents
3. Approved colorant lists:
 - Commission Regulation (EU) No. 1129/2011, Annex II, Part B (<https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32011R1129>)
 - Food Standards Australia New Zealand (FSANZ) in Australia New Zealand Food Standards Code – Schedule 16 – Types of substances that may be used as food additives (<https://www.legislation.gov.au/Details/F2019C00128>)
4. Approved fragrance lists:
 - Research Institute for Fragrance Materials (RIFM) Database (see www.rifm.org/)
 - The IFRA list of fragrance ingredients (<https://ifrafragrance.org/initiatives/transparency/ifra-transparency-list>)
5. Submission and payment are through <https://www.davorenenvironmental.com.au/accord-recognised.html>