



Recognised Ecolabel: Guidance on Variations to Licensed Products

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This Guidance document outlines the process for Licence Holders who wish to vary the formulation or packaging of a product already licensed under the Recognised ecolabel program. It clarifies which types of formulation or packaging changes are permitted under an existing Recognised Licence and how these variations are assessed.

A. 'Minor' variations to existing formulations

Minor variations to a Licenced Product do not require further third-party assessment. The following are defined as minor variations:

- 1. Fragrance:** If the variation is to the concentration and/or type of fragrance and the new 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'.
 - Research Institute for Fragrance Materials (RIFM) Database (www.rifm.org/)
 - The IFRA list of fragrance ingredients (www.ifrafragrance.org/initiatives/transparency/ifra-transparency-list)
- 2. Colourant:** If the variation is to the colourant, and the colourant is on one of the approved lists/standards below, present at < 0.1% in the formulation concentrate, and the Applicant can supply evidence regarding metal content¹, the variation is considered 'minor'.
 - Listed by Commission Regulation (EU) No. 1129/2011, Annex II, Part B (<https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32011R1129>)
 - Listed by 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* (www.legislation.gov.au/Details/F2019C00128)
 - A natural colour².
- 3. % 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 further assessment.
- 4. Brand name:** If the variation is to the brand name only, the variation is considered minor, and the Formulation does not require further assessment.

¹ See *Recognised Ecolabel Standard* Section 6.2.3. The Applicant must supply a certificate of analysis or signed declaration from the colourant manufacturer that none of the metals listed in Section 6.2.3 of the Standard were used in the manufacture of the dye/colourant and the levels of lead, cadmium, arsenic and mercury are below the permitted levels.

² To be a natural colour, the [ICNA Act 2019](#) definition of 'naturally-occurring chemical' must apply:

- (a) an unprocessed chemical occurring in a natural environment; or
- (b) a chemical occurring in a natural environment, being a substance that is extracted by:
 - (i) manual, mechanical or gravitational means; or
 - (ii) dissolution in water; or
 - (iii) flotation; or
 - (iv) a process of heating for the sole purpose of removing uncombined water; without chemical change in the substance; or
 - (v) any other process prescribed by the [rules](#) for the purposes of this subparagraph.

Further information is available at www.industrialchemicals.gov.au/business/getting-started-registration-importing-and-manufacturing/organic-and-natural-ingredients#what-is-a-naturally-occurring-chemical

How to apply

If, following review of this Guidance document, the Applicant determines that the variation qualifies as a minor variation, no further third-party assessment is required. The Applicant should submit the Variation Certification Form to the Third-party Assessor to confirm that the product meets the minor variation criteria listed above. If the variation is the addition of a colourant ingredient that meets the requirements above, the Applicant must also provide evidence regarding metal content, as required by Section 6.2.3 of the Recognised Standard.

The Variation Certification Form is at www.accord.asn.au/sustainability/recognised/recognised-documents.

Refer to the flowchart on page 4 for further guidance on the decision process for product variations.

B. All other variations to licensed products

If a proposed variation to a Licensed Product is not a minor variation (as defined in Section A), but the Applicant believes it does not affect the product's ability to meet the Recognised Standard, the Applicant may submit a Variation Application requesting confirmation that the variation is an *immaterial* variation.

An immaterial variation may include formulation adjustments that do not affect human or environmental safety, or a change in supplier for an ingredient such as a palm-derived component or colourant, or a modification to packaging. Variations that increase the concentration of an existing ingredient by more than a few percent are unlikely to be considered immaterial.

Variations that introduce a new ingredient (unless the new ingredient is a fragrance or colourant that meets the criteria specified in Section A) are **not** eligible for Variation Assessment and must be submitted as a new application.

Similarly, if numerous simultaneous variations to the formulation (ingredient concentration or supplier) are proposed, a new application is required if the changes exceed either of the following limits, calculated **exclusive of water**:

1. Ingredient Count Limit: More than half (> 50%) of the total ingredients (by count) have been varied.
2. Mass/Proportion Limit: The variations pertain to more than ten percent (10%) of the total mass or volume of the formulation.

How to apply

If, following review of this Guidance document, the Applicant determines that the variation qualifies for a Variation Assessment, the Applicant must submit their variation through the New Application link at www.davorenenvironmental.com.au/recognised and confirm within the application that this submission is for a variation to an existing formulation currently licensed under the scheme referencing the original application number for the Licensed Product and providing all required supporting evidence. The Screening Fee applies.

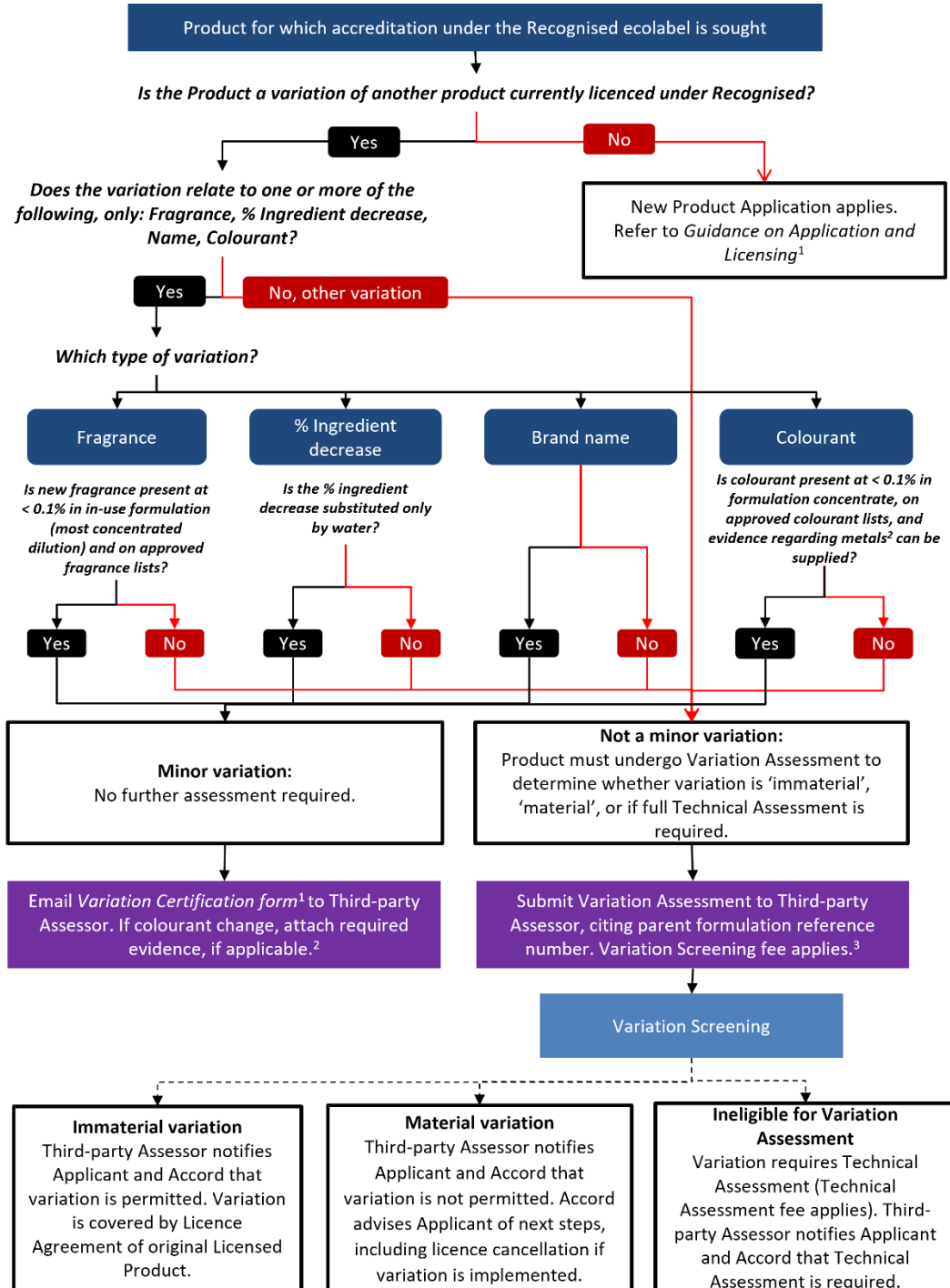
The Third-party Assessor will review the information contained in the Variation Application. If information is missing, the Third-party Assessor will notify the Applicant, who has 20 business days to provide the missing information. If all requested information is not provided within this timeframe, the Variation Application fails screening. The Third-party Assessor will notify the Applicant and Accord that the Variation Application has failed screening and that the variation is not permitted under the Recognised ecolabel program.

If all information is provided, the Third-party Assessor will determine whether the Variation is immaterial (permitted), material (not permitted), or ineligible for Variation Assessment.

- If assessed as an *immaterial variation*: no further assessment is required. The Third-party Assessor notifies the Applicant and Accord that the variation **is permitted** under the Recognised ecolabel program. The Licence Agreement of the original Licensed Product covers the Variation.
- If assessed as a *material variation*: no further assessment is required. The Third-party Assessor notifies the Applicant and Accord that the variation **is not permitted** under the Recognised ecolabel program. Accord will advise the Applicant of the next steps, including regarding licence cancellation if the variation is implemented.
- If assessed as *ineligible* for Variation Assessment: the variation requires a full Technical Assessment, for which the Technical Assessment fee also applies. The Third-party Assessor notifies the Applicant and Accord that a Technical Assessment is required. The variation is assessed as a new application and assigned a new application number. If it passes Technical Assessment, the product is eligible for a new Licence Agreement.

Please refer to the flowchart on page 4 for further guidance on the decision process for product variations.

Decision flowchart for variations



¹ Available at www.accord.asn.au/sustainability/recognised/recognised-documents

² See Recognised Standard section 6.2.3. If the change is to the colourant ingredient, not just the concentration, the following evidence must be submitted:

- Certificate of analysis (from colourant manufacturer/supplier) confirming that none of the listed metals were used in the manufacture of the colourant and the specified metals are below the permitted levels.
OR (if not available)
- Signed declaration from dye/colourant manufacturer/supplier confirming that none of the listed metals were used in the manufacture of the dye/colourant and that the specified metals are below the permitted levels (see Annex H of Recognised Standard).

³ Submission and payment are through www.davorenenvironmental.com.au/accord-recognised.html