

National Chemical Inventory of New Zealand

1. Overview of the New Zealand Inventory of Chemicals (NZIoC)

The New Zealand Inventory of Chemicals (NZIoC) is maintained by the Environmental Protection Authority (EPA) that lists hazardous chemical components of products approved under group standards. It serves as a reference for importers, manufacturers, and regulatory bodies to determine whether a chemical is pre-approved for use in New Zealand or if additional approvals are required.

Key Features of the NZIoC

- Covers hazardous chemicals only – Non-hazardous substances are not required to be listed.
- Linked to Group Standards – Many group standards require the hazardous components of products to be listed on the NZIoC.
- Not an automatic approval list – Listing on the NZIoC does not automatically grant permission for use; compliance with applicable controls is still required.
- Regulated under the Hazardous Substances and New Organisms (HSNO) Act 1996.

Substances Requiring Registration

- If a single-component chemical or a formulated product contains hazardous components not listed on the NZIoC, a new chemical notification must be submitted to the EPA for approval under the HSNO Act.
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2. Hazardous Substances and the HSNO Act

The **Hazardous Substances and New Organisms Act (HSNO) 1996** came into force for:

- New organisms on 29 July 1998.
- Hazardous substances on 2 July 2001.

This Act ensures risk management for hazardous substances and requires approval for new chemicals before they are legally introduced into New Zealand.

Criteria for Hazardous Substances

A substance is considered hazardous under the HSNO Act if it has one or more of the following properties:

- Explosiveness
- Flammability
- Oxidizing capacity
- Toxicity
- Corrosiveness
- Ecotoxicity (*toxic to the environment*)

Common hazardous substances include:

- Paints, adhesives, garden sprays, pool chemicals, and cleaning products.
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3. Exemptions from the HSNO Act

Certain substances are exempt from HSNO Act requirements, including:

- Hazardous substances used exclusively in exempt laboratories.
 - Medicines.
 - Infectious substances (UN Class 6).
 - Ozone-depleting substances.
 - Food.
 - Manufactured articles.
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4. New Chemical Registration and Notification Process

If a hazardous chemical is not listed on the NZIoC, businesses must apply for approval through the EPA before importation or manufacturing.

A. Standard Notification for New Chemicals

If a substance is new to New Zealand, it must be registered through a formal risk assessment process.

Step 1: Pre-Submission Check

- Verify if the substance is already listed on the NZIoC.
- If it is not listed, determine whether a group standard applies.
- If no group standard applies, full registration is required.

Step 2: Application Submission

Applicants must submit a New Chemical Notification (NCN) to the EPA, including:

- Chemical identity and structure (CAS number, molecular formula).
- Physical-chemical properties (melting/boiling point, solubility).
- Hazard classification under the Globally Harmonized System (GHS).
- Toxicological and environmental impact assessments.
- Proposed use and exposure scenarios (industrial, consumer, or commercial).
- Safety Data Sheet (SDS) and labeling requirements.

Step 3: EPA Risk Assessment and Approval

- The EPA evaluates the risks associated with the substance, considering toxicity, persistence, and potential environmental effects.
 - If the benefits outweigh risks, the chemical is approved and added to the NZIoC.
 - Additional controls may be imposed based on the risk assessment.
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5. Alternative Notification Pathways

For certain low-risk chemicals, simplified notification processes are available:

A. Low Volume Exemption (LVE)

For low-volume imports or manufacture, businesses may apply for an LVE exemption.

Eligibility Criteria

- The chemical must not be highly hazardous.
- The total annual volume must be ≤ 10 tonnes per year.
- The substance is used for specific purposes (e.g., industrial processing).

Submission Requirements

- Basic hazard and exposure data.
- Annual volume tracking and reporting.

B. Research and Development (R&D) Exemption

- Applies to substances used exclusively for R&D (not commercial use).
- The quantity must be below a defined threshold.
- Record-keeping obligations apply.

C. Polymers of Low Concern (PLC) Exemption

- Polymers with high molecular weight and low bioavailability may be exempt.
 - Companies must submit:
 - Polymer structure and composition.
 - Evidence that the polymer does not persist in the environment.
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6. Compliance and Ongoing Reporting Obligations

Once a chemical is registered, importers and manufacturers must meet annual reporting requirements.

A. Annual Volume Reporting

- Businesses must submit an annual declaration of the quantity imported or manufactured.
- If a company exceeds the approved volume, additional approvals may be required.

B. Record-Keeping Requirements

- Maintain comprehensive documentation on:
 - SDS and hazard classifications.
 - Exposure assessments.
 - Regulatory compliance measures.

C. Labeling and Safety Data Sheet (SDS) Compliance

- All hazardous substances must be labeled according to GHS standards.
 - If used in workplaces, the product must comply with WorkSafe NZ safety regulations.
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7. Recent Regulatory Updates

- April 2021: New Zealand updated its Hazardous Substances (Importers and Manufacturers) Notice.
 - Importers and manufacturers must provide business contact details to the EPA.
 - This regulation ensures traceability of chemical suppliers in case of incidents.
 - March 2024: Proposal to reduce lead levels in consumer products (paints, inks, and graphic materials).
 - Affected businesses must phase out high-lead formulations.
 - 2024 Legislative Review:
 - Stronger alignment with Australia's AICIS and EU REACH for regulatory consistency.
 - Expansion of risk assessment criteria for new chemical approvals.
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Importing Chemicals Listed on the New Zealand Inventory of Chemicals (NZIoC)

If a chemical is listed on the NZIoC, it does not automatically mean it can be imported without further notification or regulatory steps. Here's how it works:

1. Determining If a Chemical Can Be Imported Without Notification

If a chemical is listed on the NZIoC and meets all the following conditions, it can be imported without additional notification:

- It matches the listed chemical identity (CAS number, chemical structure, purity, etc.).
- It is used in a manner that aligns with existing approvals (e.g., industrial use, consumer products).
- It is covered under a relevant Group Standard (e.g., Industrial Chemicals Group Standard, Cosmetic Products Group Standard).
- It does not exceed volume thresholds for specific regulatory triggers.
- It does not require additional risk assessment (e.g., does not contain new contaminants or impurities that change its hazard profile).

If any of the above conditions are NOT met, additional notification may be required.

2. When Additional Notification or Registration is Required

Even if a chemical is on the NZIoC, notification to the Environmental Protection Authority (EPA) may still be needed in the following cases:

Chemical Is Not Covered Under an Existing Approval or Group Standard:

- If the intended use is not already covered by an existing approval, additional assessment may be required.

Chemical Use Differs From Approved Conditions:

- If a chemical was listed for industrial use, but is planned to be used in cosmetics or agriculture, it may need new approvals.

Substance Exceeds Volume Reporting Requirements:

- Some hazardous substances require annual reporting if imports exceed a certain quantity (e.g., 10 tons per year).

Chemical Has Been Reclassified or Is Subject to New Restrictions:

- Some substances may be re-evaluated and reclassified as requiring additional safety measures.

3. How to Check If a Chemical Can Be Imported Without Notification

Before importing, check:

NZIoC Listing: Verify if the chemical is on the **NZIoC database** ([NZIoC Search](#)).

Group Standards Coverage: Identify if it falls under a Group Standard to determine automatic approval or additional controls.

Restrictions or Reporting Obligations: Confirm if the chemical has conditions, volume limits, or special risk assessments.