



Factsheets on Nanomaterials - NATRUE position:

“NATRUE does not exclude the use of SCCS assessed nano forms of ingredients compliant with the NATRUE criteria (e.g. Titanium Dioxide; Zinc Oxide^{2,3}). Currently no evidence of safety concerns presented by EU institutions (SCCS or JRC)^{2,3,7} for nano forms of Titanium Dioxide or Zinc Oxide^{2,3} to substantiate exclusion exist. The choice to use nano forms of such ingredients is solely a decision of the respective individual company. This decision affects neither the strictness nor the strengths of the NATRUE criteria as a definition for natural and organic cosmetics.”

Dr. Mark Smith – NATRUE’s Regulatory and Scientific Manager

Why is there no exclusion of nanomaterials in the NATRUE Label Criteria?

NATRUE is not in a position either scientifically or politically to produce a subjective definition on an EU and/or internationally unregulated subject. NATRUE fully supports the on-going action of the legal requirement for mandatory labelling and associated regulatory requirements for nanomaterials in cosmetics products. The process is importantly still under discussion and development, and NATRUE continually monitors this subject area for new developments and information.

What is the regulatory and scientific state-of-play?

Nanotechnology is an emerging and developing field with application to many sectors. A first EU regulatory definition¹, scientific opinions^{2,3}, assessment methods and management of any risk of nanomaterials⁴ exist. Major scientific and regulatory challenges for nanomaterials are in relation to improvement to:

- Physical characterisation methods
- Exposure assessment
- Hazard identification/characterisation

Are there any safety concerns?

All nanomaterials used in cosmetic products require a thorough assessment of safety. EU Commission must approve nanomaterials 6 months before reaching the (cosmetics) market. Nanoscale ingredients must be labelled (INCI name of the ingredient, followed by ‘nano’ in brackets)^{5,6}. Any concerns over safety within EU are referred to SCCS (Scientific Committee on Consumer Safety) for scientific opinion².

Referenced Opinions:

1. DG Environment
(http://ec.europa.eu/environment/chemicals/nanotech/faq/definition_en.htm)
2. Scientific Committees Consumer Safety – Opinions
(http://ec.europa.eu/health/scientific_committees/consumer_safety/opinions/index_en.htm)
3. Scientific Committees Consumer Safety – Science fact-sheets
(http://ec.europa.eu/health/scientific_committees/policy/opinions_plain_language/index_en.htm)
4. JRC - Nanotechnology
(<https://ec.europa.eu/jrc/en/research-topic/nanotechnology>)
5. DG Grow – Cosmetics Legislation
(http://ec.europa.eu/growth/sectors/cosmetics/legislation/index_en.htm)
6. DG Grow – Nanomaterials
(http://ec.europa.eu/growth/sectors/cosmetics/products/nanomaterials/index_en.htm)
7. The JRC Web Platform on Nanomaterials
(http://ihcp.jrc.ec.europa.eu/our_databases/web-platform-on-nanomaterials)