



NATRUE Label: requirements to be met by natural and organic cosmetics

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Updated text passages (in comparison to Version 2.6) are highlighted in yellow.

Preface

Man has conquered a variety of environments without being able to adapt his body. Architecture, clothing and cosmetics - all cultural achievements of civilization – are the substitute for adaptation by the human body. Beyond their purely technical functions, architecture and clothing also have an aesthetic function. The same is true for (decorative) cosmetics. Animals, by contrast, are perfectly adapted to their restricted environment. Scales, furs, carapaces or feathers cover and protect their bodies from the environment.

Recent developments, particularly in the food sector but also in other industries, have highlighted the growing importance of “naturalness” for consumers. Consumers have changed their habits and are paying increasing attention to “natural” aspects when buying cosmetics, too. This trend is very likely going to continue.

However, the assessment of the “naturalness” of food on the one hand and cosmetics on the other hand is not directly comparable. The most important aspects of “naturalness” in food include its occurrence in nature, forms of cultivation and traceability of production, as reflected in the multitude of “natural” and “organic” labels. Natural cosmetics, by contrast, are usually complex compositions of natural, mostly processed raw materials. Hence, they have to be evaluated differently.

A number of definitions and corresponding labels for natural cosmetics have been around for some time now on both the national and the international level. This raises the question: do we really need another definition? The biggest challenge facing the production of natural cosmetics – along with the selection of adequate raw materials – is to be able to offer consumers effective, safe and sensorily appealing high-quality products. However, products of this kind cannot always be manufactured exclusively from pure natural ingredients. If we look at clothing for example, appealing products – contrary to food – cannot be solely produced from pure, non-modified natural substances. The example of textiles made from fibres springs to mind.

For cosmetics, too, the question arises as to which natural ingredients can be used without being modified, where (physico-) chemical modifications seem to be necessary in a clearly defined framework, and how substances which are “close to natural substances” are to be evaluated. Compromises of this kind are necessary to a certain extent. However, care must be taken to ensure that they are transparent and comprehensible for the consumer and that the consumer is sufficiently informed. Nevertheless, these compromises should be limited to the absolutely necessary. The definition of “natural cosmetics” must not be rendered implausible by a multitude of seemingly arbitrary exceptions. The proposed criteria for the NATRUE Label are to go further than any definition of “natural cosmetics” so far established in Germany and Europe in terms of consistency and complete transparency. Only natural, some nature-identical and derived natural raw materials may be used in line with the requirements listed below.



The complete background information concerning the NATRUE Label is freely available on the Internet for all interested parties – consumers as well as manufacturers. At www.natrue.org, criteria, lists of approved substances, a list of certified products and raw materials but also FAQs are readily accessible. Furthermore, questions can be asked and comments posted on this website.

Independently of the formulation of a natural cosmetic product, all products must comply first and foremost with the basic requirements of Directive 76/768/EEC (Cosmetics Directive of the European Union) and regulation (EG Nr. 1223/2009), particularly with regard to their composition, safety, efficacy and labelling requirements.

Apart from *water*, which is the basis and therefore often the largest ingredient in cosmetic formulations, chemically unmodified *natural ingredients* (*natural substances*, e.g. fatty oils, hydro-alcoholic plant extracts) usually predominate in the finished product if it is claimed to be a “natural cosmetic product”. The chemically non-modified natural ingredients used should preferably be of organic grade.

Nature-identical substances may only be used when natural substances cannot be recovered from nature using reasonable technical effort. Nature-identical ingredients are dealt with in corresponding positive lists.

Derived natural substances are only justified if their function cannot be achieved using natural substances. Derived natural substances are always recovered from natural substances although mineral oil is excluded as a raw material. They should only be manufactured using processes which are modelled on physiological mechanisms (e.g. formation of partial glycerides by fat digestion). The number of chemical conversion steps should be kept to a minimum.

The natural starting materials for derived natural raw materials should preferably be of organic grade. The environmental compatibility of derived natural substances must be evaluated separately to ensure they can be returned without causing any problems to the natural circle. Thus, derived natural substances, which are used as surfactants, must meet particularly strict requirements regarding their biodegradability.

Aspects of sustainable development must also be taken into account along the entire value chain, under respect of biodiversity (submission of a sustainability report or an environmental impact assessment by the manufacturers).

The concrete requirements to be met by natural cosmetics listed below comprise

- open lists of derived natural substances and nature-identical substances which have been approved for use in natural cosmetics,
- descriptions of permitted manufacturing processes for natural cosmetics as well as for natural, derived natural and nature-identical raw materials,
- the required minimum levels of natural substances and substances of organic grade, and the maximum levels for derived natural raw materials in the three categories “natural cosmetics”, “natural cosmetics with an organic portion” and “organic cosmetics”,
- as well as criteria for packaging and certain carrier materials.



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Natural and Organic
Cosmetics

The certification of products on the basis of NATRUE criteria for natural and bio cosmetics is possible independent of membership of NATRUE or other institutions. In order to use the NATRUE label, it is necessary for at least 75 % of all finished cosmetic products (in terms of formulations) in a delimitable series of products of the same brand (along the lines of brand names and brand communication) to be certified as natural or organic cosmetics. These requirements do not apply for cosmetic raw materials.

In principle all legal references given in this catalogue of requirements are related to EU law in force at the moment. In non EU countries/regions these references must be adapted according to the corresponding national regulations in the countries in which the respective products will be marketed.

END of the preface.



A. Definition of permitted ingredients and processes

1. a) Natural cosmetics are products which – subject to nos. 2 and 3 – are produced exclusively from **natural substances**.

Natural substances are substances of botanic, inorganic-mineral or animal origin (except for dead vertebrates) and their mixtures and “reaction products” with each other. Only physical processes including extraction with the extraction and purifying agents listed in Annex 1a and the pH-adjusting agents listed in Annex 1b are permitted for recovery and further processing. Furthermore, enzymatic and microbiological methods are also permitted in so far as exclusively naturally occurring enzymes or micro-organisms are used and the conditions and processes resemble those which occur in nature. Raw materials of plant or animal origin as well as finished products may not be subjected to ionizing radiation. The bleaching of natural substances is only permitted when no chlorine is used (sodium hypochlorite). In terms of GMO, finished products and starting materials, as well as the used enzymes and microorganisms must comply with the criteria laid down in the EC eco-regulations [Regulation (EC) No 834/2007, former (until 31 December 2008) Regulation (EEC) No 2092/91]. This requirement also applies to substances which are not covered by the Regulation (e.g. non-organic certified ingredients, non-food or -feed substances).

b) In natural cosmetics, natural fragrances (for example essential oils) which correspond to ISO standard 9235 may be used. This includes isolates of essential oils and essential oils reconstructed from them. Synthetic nature-identical fragrances may not be used in natural cosmetics. The natural fragrance material must also comply with all other requirement of the NATRUE-label criteria defined above.

c) The origin of the water used in natural cosmetics is arbitrary. When calculating the portion of natural substances in the finished product (cf. section B), water is in either case only considered as natural substance if it derives directly from a vegetable source (directly obtained vegetable juices).

2. For the preservation of natural cosmetics, the **nature-identical preservatives** listed in Annex 2a may be used [in compliance with Annex VI (part one) of Directive 76/768/EEC]. The use of these substances has to be indicated by the wording “preserved with ...” on the product packaging.

The **nature-identical inorganic pigments and minerals** listed in Annex 2b may also be used in natural cosmetics.

3. **Derived natural substances** may only be used for the production of natural cosmetics if they are recovered using chemical reactions, including biotechnological processes, from natural substances as defined in section A.1.a (e.g. fats, oils, waxes, lecithins, mono-, oligo- and polysaccharides, proteins and lipoproteins).

The following chemical reactions are permitted: hydrolysis (including saponification), neutralisation, condensation with elimination of water, esterification, transesterification, hydrogenation, hydrogenolysis, dehydrogenation, glycosidation, phosphorylation,



sulphatation, acylation, amidation, oxidation (with oxygen, ozone and peroxides) and pyrolysis.

Derived natural substances also include further substances (besides those mentioned in 2) which do occur naturally but cannot be recovered in sufficient amounts from their natural sources using state-of-the-art technology.

Annex 3 contains an open list of approved derived natural substances (INCI) which may comply with the above-mentioned requirements.

The detergent surfactants used must be completely biodegradable in accordance with the EC Regulation on Detergents [Regulation (EC) No 648/2004].

All necessary auxiliary materials and catalysts, including enzymes and micro-organisms, which are not explicitly defined in the NATRUE Criteria, but are technically unavoidable or are used to have a better adapted energy efficiency in the context of improving sustainability – have to be removed, after use, completely or at least considered as technically unavoidable and technologically ineffective traces in the finished product.

4. During all manufacturing, processing and filling processes it must be ensured that undesirable substances deriving from these processes, packages or storage containers materials do not migrate to the products.



B. Minimum requirements to be met by levels of natural substances, natural substances of organic grade, and maximum levels of derived natural substances

1. NATURAL COSMETICS

The minimum levels of natural substances and the maximum levels of derived natural raw materials (referring to the whole formulation) are presented by product group in Table 1 (Annex 4 does not apply here).

Water-containing natural substances are taken into account with the following percentage by weight: *

- a) Vegetable juices: 100 % as natural substance
- b) Concentrated vegetable juices: only the 100 % concentrate (as a natural substance) but not the water used for dilution
- c) Aqueous extracts: only the plant portion
- d) Hydroalcoholic extracts: the plant and alcoholic portions (if this is a natural substance)

2. NATURAL COSMETICS WITH AN ORGANIC PORTION

Basic requirement:

Over and above the basic requirements laid down under 1., the following additional requirements have to be met: The product must contain (referred to the whole formulation) at least 15 % of chemically unmodified natural substances and maximum 15 % of derived natural substances (cf. Table 2).

Additional requirements:

- 1) At least 70 % of the natural substances of plant and animal origin and of derived natural substances (if applicable and as per § B2.2.) contained in the product must come from controlled organic farming and/or from controlled wild collection in line with the criteria laid down in the EC eco-regulations [Regulation (EC) No 834/2007, former (until 31 December 2008) Regulation (EEC) No 2092/91] or in the USDA *National Organic Program* (NOP).
- 2) In case derived natural substances contained in the product have been produced out of controlled organic starting material, the organic amount as defined in Annex 4 will be considered and added to the organic total amount. This list will be updated regularly, in order to take the increasing availability of such organic based derived natural raw materials into consideration.

3. ORGANIC COSMETICS

Basic requirement:

Over and above the basic requirements laid down under 2., the following additional requirements have to be met: The product must contain (referred to the whole formulation) at least 20 % of chemically unmodified natural substances and maximum 15 % of derived natural substances (cf. Table 3).

Additional requirements:

- 1) At least 95 % of the natural substances of plant and animal origin and of derived natural substances (if applicable and as per § B3.2.) contained in the product must come from controlled organic farming and/or from controlled wild collection in line with the criteria laid down in the EC eco-regulations [Regulation (EC) No 834/2007, former (until 31 December



2008) Regulation (EEC) No 2092/91] or in the USDA *National Organic Program* (NOP).

- 2) In case derived natural substances contained in the product have been produced out of controlled organic starting material, the organic amount as defined in Annex 4 will be considered and added to the organic total amount. This list will be updated regularly, in order to take the increasing availability of such organic based derived natural raw materials into consideration.

* Examples for the calculation of plant extracts & hydrolates/floral waters are given in Annex 5.
For soaps: natural and derived natural part to be added.

C. Requirements to be met by carrier materials (e.g. for wet wipes and pads)

All carrier materials of cosmetics, used for the topical application of a formulation to the skin (e.g. wipes or pads) must comply with the requirements for natural and/or derived natural substances recovered from renewable raw materials.

D. Requirements to be met by packaging and packaging materials

1. As far as possible packaging must be kept to a minimum.
2. If at all possible, products should be designed for multiple uses (except for sample packs).
3. If at all technically feasible and available, recyclable packaging materials, if possible made of renewable raw materials, are to be used.
4. Halogenated plastics may not be used as packaging materials.
5. Pressurised gas packs with Air, Nitrogen, Oxygen and/or Carbon dioxide (but without VOC - Volatile Organic compounds) can be certified as natural or organic cosmetics according to NATRUE. The gases won't be taken into consideration for calculations as of Table 1, 2 or 3 (see below)

Annexes: Please find following annexes in the online available excel file "Annexes"

Annex 1a: Extraction agents approved for the production of natural substances

Annex 1b: pH-adjusting and ion exchange agents approved for the production of natural cosmetics

Annex 2a: Nature-identical preservatives approved for the production of natural cosmetics

Annex 2b: Nature-identical inorganic pigments and minerals approved in natural cosmetics

Annex 3: Derived natural substances approved for the production of natural cosmetics (open list of INCI designations)

Annex 4: Organic portion of derived natural substances if they have been processed from organic raw materials according to the criteria laid down in Regulation (EC) No 834/2007, former (until 31 December 2008) Regulation (EEC) No 2092/91 or in the USDA National Organic Program (NOP)

Annex 5: Examples for the calculation of the natural (organic) portion of plant extracts and hydrolates / floral waters



Table 1: Requirements to be met by the “natural cosmetics” category

	1***	2	3	4	5	6	7	8	9	10	11***	12	13
Content of raw materials referred to the finished product (%)	Oils/water-free cleaning and skin care products	Parfums, Eaux de Parfum, Eaux de Toilette, Eaux de Cologne	Skin care emulsions (W/O) and Oleogels	Decorative cosmetics containing water	Deodorants and antiperspirants	Skin care emulsions (O/W) and gels	Sunscreens	Hair treatment products	Cleaning products containing surfactants	Oral care	Decorative cosmetics, water-free	Soaps	Waters
Water content (%)	Water-free	No specific requirement or limitation									Water-free	No specific requirement or limitation	
Minimum content of natural substances (%)	90	60	30	15	15	10	10	3	3	2	1	1	0.1
Content of nature-identical substances (%)	No specific requirement or limitation												
Maximum content of derived natural substances (%)	10	10	15	20	30	20	45	40	85	70	50	99	5

*** Up to 4.4 % water contained in alcohol is excluded when considering the product category thus the product is considered water-free.



Table 2: Requirements to be met by the “natural cosmetics with an organic portion” category

	1	2	3	4	5	6	7	8	9	10	11	12	13
Content of raw materials referred to the finished product (%)	Oils/water-free cleaning and skin care products	Parfums, Eaux de Parfum, Eaux de Toilette, Eaux de Cologne	Skin care emulsions (W/O) and Oleogels	Decorative cosmetics containing water	Deodorants and antiperspirants	Skin care emulsions (O/W) and gels	Sunscreens	Hair treatment products	Cleaning products containing surfactants	Oral care	Decorative cosmetics, water-free	Soaps #	Waters
Water content (%)	Water-free	No specific requirement or limitation									Water-free	No specific requirement or limitation	
Minimum content of natural substances (%)	90*	60*	30*	15*	15*	15*	15*	15*	15*	15*	15*	1*	15*
Content of nature-identical substances (%)	No specific requirement or limitation												
Maximum content of derived natural substances (%)	10**	10**	15**	15**	15**	15**	15**	15**	15**	15**	15**	99**	5**

* Please take notice of the additional requirements on the content of substances from controlled organic farming in section B. 2.

** Please take notice of the additional requirements with regard to the production of derived natural substances made of organic starting material in section B. 2.

*** Up to 4.4 % water contained in alcohol is excluded when considering the product category thus the product is considered water-free.

Please note, that the additional requirements with regard to soaps in section B. 2.



Table 3: Requirements to be met by the “organic cosmetics” category

	1***	2	3	4	5	6	7	8	9	10	11***	12	13
Content of raw materials referred to the finished product (%)	Oils/water-free cleaning and skin care products	Parfums, Eaux de Parfum, Eaux de Toilette, Eaux de Cologne	Skin care emulsions (W/O) and Oleogels	Decorative cosmetics containing water	Deodorants and antiperspirants	Skin care emulsions (O/W) and gels	Sunscreens	Hair treatment products	Cleaning products containing surfactants	Oral care	Decorative cosmetics, water-free	Soaps #	Waters
Water content (%)	Water-free	No specific requirement or limitation									Water-free	No specific requirement or limitation	
Minimum content of natural substances (%)	90*	60*	30*	20*	20*	20*	20*	20*	20*	20*	20*	1*	20*
Content of nature-identical substances (%)	No specific requirement or limitation												
Maximum content of derived natural substances (%)	10**	10**	15**	15**	15**	15**	15**	15**	15**	15**	15**	99**	5**

* Please take notice of the additional requirements on the content of substances from controlled organic farming in section B. 3.

** Please take notice of the additional requirements with regard to the production of derived natural substances made of organic starting material in section B. 3.

*** Up to 4.4 % water contained in alcohol is excluded when considering the product category thus the product is considered water-free.

Please note the additional requirements with regard to soaps in section B. 3.
