



Fact-sheets on Article 20¹ & ISO Guidelines on natural and organic cosmetics^{2, 3} – NATRUE Position

*In 2010 the conventional cosmetic industry tabled **draft guidelines for natural and organic products with the International Standardization Organization (ISO) which are expected to be weaker than the NATRUE standard** and this without taking consideration of consumer expectations. In order to clarify this fundamental question, NATRUE decided to carry out an independent consumer enquiry with GfK, an international research organization recognized by and used by the European Commission.*

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

What is the state of play concerning standards for natural and organic cosmetics?

As the terms 'natural' and 'organic' for cosmetics remain without a regulatory definition to date, private standards have existed for many years to provide reassurance and contrast to greenwashed/natural inspired products to thousands of consumers. Today the demand for natural and organic cosmetics no longer pertains to a niche market but is constantly increasing and is therefore an interesting business proposition.

Will the ISO Guidelines be adopted at European level under Article 20 of the EU Cosmetics Regulation?

The possible routes for the ISO Guidelines to be enforced at European level are:

- **The European Commission** could issue a mandate to CEN (The European Standardization organization) with the objective to translate the ISO requirements into European requirements. If this were to be the case, the standard would be mandatory and referenced in the EU Cosmetics Regulation under Article 20 which requires the Commission to draft common criteria for claims (but not necessarily natural and organic) – currently this possibility seems to have been ruled out according to the new Commission. The Commission are contemplating simply strengthening the Regulation issued in 2013 on **general** criteria for claims in an initial response to Article 20.
- **A member State** could table the Guidelines at CEN as a kick off document in order to create a European Standard but if this were to be the case **it would not be referenced** in the EU Cosmetics Regulation and be a voluntary standard as opposed to mandatory.
- **A company** may unilaterally decide to refer to/certify their products to comply with the ISO Guidelines. This would lead to consumer confusion as the Guidelines 1) in part 1 define what ISO consider to be natural and organic ingredients (the NATRUE criteria is much stricter in its definition), and 2) the second part provides calculations of the content of those ingredients in a final product (not compliance of the entire finished product). This could lead to a situation whereby a product claiming 75% natural and/or organic according to the ISO Guidelines will appear to be more natural and/or organic than a NATRUE Label compliant product whereas the contrary is true and will therefore be misleading for consumers.

¹ EU Cosmetics Regulation 1223/2009

<http://eur-lex.europa.eu/legalcontent/EN/TXT/?uri=CELEX:32009R1223>

² ISO 16128-1 - Guidelines on technical definitions and criteria for natural and organic cosmetic ingredients and products -- Part 1: Definitions for ingredients

http://www.iso.org/iso/home/store/catalogue_tc/catalogue_detail.htm?csnumber=62503

³ ISO 16128-2 Guidelines on technical definitions and criteria for natural & organic cosmetic ingredients and products -- Part 2: Criteria for ingredients and products

http://www.iso.org/iso/home/store/catalogue_tc/catalogue_detail.htm?csnumber=65197



NATRUE claims to defend a strict definition of natural and organic cosmetics – how does it do this?

NATRUE contributes to the regulatory decision making process in all international relevant arenas to safeguard the authenticity of products to the benefit of consumers worldwide. Dr Mark Smith (Regulatory and Scientific Manager) has been nominated as the NATRUE representative:

- In the European Commission's Working Group on Cosmetic Products where all issues concerning emerging/evolving cosmetic regulation is discussed; This enables NATRUE to monitor and contribute to all future regulatory developments impacting natural and organic cosmetics
- In CEN's (European Standardization Organization) Cosmetic Working Group, CEN/TC 392, enabling NATRUE to monitor and contribute to all future developments impacting natural and organic cosmetics at European level
- Of the Cosmetics Working Group at ISO (TC/217/WG 4) on: (1) draft Guidelines for the definition of natural and organic ingredients and (2) criteria on how to calculate the content of those ingredients contained in finished products (but not an overview of the contents of the final product as a whole) and contributes to the process on behalf of NATRUE and its members based on agreed NATRUE positions.
- Also takes part in and contributes to Round Table discussions involving all relevant stakeholders and organized by Cosmetics Europe (conventional cosmetic association) where the evolution of the ISO process is discussed

NATRUE organizes awareness raising events with relevant stakeholders. For example in November 2014 NATRUE held a two day event in the European Parliament presenting the results of a study designed to establish consumer expectations vis-à-vis natural and organic cosmetics. In order to ensure impartiality, NATRUE gave a mandate to GfK (a consumer inquiry consultancy recognized and used by the by the European institutions) to carry out an **independent** consumer inquiry. The results illustrated that 9 out of 10 consumers interviewed stated that natural and organic cosmetics should not contain GMO's and 94% expect the products to contain uniquely natural ingredients (not the case in the currently discussed ISO Guidelines) but in-line with NATRUE's criteria.