



Fact sheet on Article 20¹ & ISO Guidelines on natural and organic cosmetics^{2, 3} – NATRUE's 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 which may not fully take into consideration 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.

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 a trustful reference to consumers who want to identify truly natural and organic cosmetics and avoid greenwashing. Today the demand for natural and organic cosmetics no longer pertains to a niche market but to a constantly increasing trend and it is therefore necessary to advocate for more transparency of NOC products.

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. The Commission is simply contemplating at this point to strengthen 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 it would only 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 can lead to consumer confusion as the Guidelines define what ISO considers to be natural and organic ingredients (the NATRUE criteria is for example much stricter in its definition) and provides calculations of the content of those ingredients in a final product, allowing them to be classified as “natural” even though if the final product includes petrochemical ingredients, mineral oils and other ingredients that cannot be included in the formulation of a truly natural and organic product under NATRUE's standard. This could hence lead to a situation whereby a product claiming being 75% natural and/or organic according to the ISO Guidelines can appear to be more natural and/or organic than a product certified with the NATRUE Label without granting the same guarantees.

¹ EU Cosmetics Regulation 1223/2009

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32009R1223&from=EN>

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 defends a rigorous definition of natural and organic cosmetics – how do we do this?

NATRUE contributes to the regulatory decision-making process in all international relevant arenas to safeguard the authenticity of natural and organic cosmetic products to the benefit of consumers worldwide. Dr Mark Smith (NATRUE's Director General) has been appointed as the NATRUE representative in:

- The **European Commission's Working Group on Cosmetic Products**, where all issues concerning emerging/evolving cosmetic regulation are discussed. NATRUE monitors and contributes to all future regulatory developments impacting natural and organic cosmetics at European level;
- **CEN's** (European Standardization Organization) **Cosmetic Working Group** (CEN/TC 392);
- The **Cosmetics Working Group at ISO** (TC/217/WG 4) on draft Guidelines for the definition of natural and organic ingredients and criteria on how to calculate the content of those ingredients present in finished products;
- **Round Table discussions** involving relevant stakeholders 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 instance, in November 2014 NATRUE held a two-day event in the European Parliament presenting the results of a study designed to establish consumer expectations about natural and organic cosmetics. In order to ensure impartiality, NATRUE gave a mandate to GfK (a consumer inquiry consultancy recognized and used 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, which is line with NATRUE's criteria.