



Factsheet on ISO 16128 guidelines – NATRUE’s position

What are the ISO 16128 guidelines?

The ISO 16128 guidelines¹ establish technical definitions and criteria for natural and organic cosmetics (NOCs). Developed within the International Standardization Organization’s (ISO), ISO 16128 guidelines represent the result of an international multi-stakeholder effort to harmonise existing references from the sector.

How do the ISO 16128 guidelines work?

The guidelines exist in two parts that work together. The first part allows the user to classify any legally permitted cosmetic ingredient into one of eight categories such as natural or non-natural. The second part allows the user to determine an index related to each ingredient, such as 1 for natural and 0 for non-natural. From these indexes and the specific composition of the formulation, the producer can calculate the percentage of natural, natural origin, organic, or organic origin content of the product.

Are ISO 16128 guidelines sufficient to combat greenwashing?

NATRUE welcomes all internationally agreed initiatives aimed at developing strict criteria to benchmark NOCs and to effectively combat greenwashing. Where the ISO guidelines fall short is by not establishing criteria for products, meaning what ingredients are accepted or not, as well as defining a minimum limit for the natural or organic content that is needed to claim a natural or organic cosmetic product. ISO 16128 guidelines cannot guarantee consumers by default that every product using the guidelines must have met the same strict product benchmarks, harmonisation and assurances (such as avoiding ingredients from GMOs, excluding arbitrary (semi-)synthetic substances or only using natural fragrances) that every certified cosmetic product claiming to be natural or organic is obligated to meet under the NATRUE Label criteria.

Differences between the NATRUE standard and ISO 16128 guidelines

Question	NATRUE ²	ISO 16128
Do I have to pay to read the standard?	<u>NO</u> , it is free and open access.	<u>YES</u> , only paid access.
Is use obligatory or voluntary?	Voluntary.	Voluntary.
What ingredients are approved?	<u>ONLY</u> those permitted by the standard’s criteria i.e., natural and nature-identical or derived natural listed in the <u>Annexes</u> .	<u>ANY</u> legally permitted cosmetic substance can be used.
Are there restrictions or prohibitions on certain ingredients?	<u>YES</u> , restricted positive list of nature-identical preservatives, pigments and minerals; prohibition of ingredients from GMOs (e.g., GMO plants).	<u>NO</u> restrictions or prohibitions other than those required by law (any ingredients from petrochemicals or GMOs are allowed).
Are there any definitions for products?	<u>YES</u> , for certifying natural or organic cosmetics with defined content.	<u>NO</u> , only possible to calculate natural and organic content based upon the formulation (case-by-case).
Can products be certified according?	<u>YES</u> , carried out by an independent approved and accredited control body.	<u>NO</u> , only possible to certify calculated content <u>BUT</u> not mandatory - no criteria to certify a NOC.
How is the product communication?	NATRUE Label on-pack for compliant products .	<u>ONLY</u> percentage content <u>BUT</u> not mandatory on-pack; ISO logo cannot be used on-pack.

¹ ISO 16128 - Guidelines on technical definitions and criteria for natural and organic cosmetic ingredients and products
Part 1 (ISO 16128-1:2016): <https://www.iso.org/standard/62503.html>
Part 2 (ISO 16128-2:2017): <https://www.iso.org/standard/65197.html>

² NATRUE standard: <https://www.natrue.org/our-standard/natrue-criteria-2/>