



# NATRUE Organization - Statement

## ISO 16128 Guidelines on technical definitions and criteria for natural and organic cosmetic ingredients and products <sup>1, 2</sup>

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

As the terms “natural” and “organic” remain to date still undefined without any regulatory definition, private standards have existed for many years to provide a reliable 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 natural and organic cosmetic (NOC) products and to reinforce the current standards that set criteria for the classification of cosmetic products as “natural” and “organic”.

### Background to ISO 16128 guidelines

One of the attempts to introduce more harmonisation in an officially undefined sector are ISO guidelines. They have been developed by the International Organization for Standardization (ISO), which is an independent, non-governmental international organization that creates documents setting specifications, requirements or guidance on a certain topic.

ISO 16128 guidelines are international guidelines for natural and organic cosmetics developed by the Cosmetics Working Group at ISO (ISO/217 WG4). In 2010, draft guidelines for NOC products were tabled by the conventional cosmetic industry together with ISO with the hopeful aim of creating harmonised technical criteria that encourage innovation, support claims and are useful to the cosmetic industry at large. As the International Natural and Organic Cosmetic Association, NATRUE joined the process as a “liaison representative”.

ISO 16128 guidelines consist of two parts: Definitions (16128-1:2016) and Criteria (16128-2:2017). In February 2016, Part 1 of ISO 16128 guidelines<sup>1</sup>, covering the technical definitions and criteria for natural and organic cosmetic ingredients and products, was published. In September 2017, Part 2 of ISO 16128 guidelines<sup>2</sup>, covering approaches to calculate natural/organic content, was published. Both parts of these guidelines are required to define and calculate natural/organic content for ingredients and products.

### What are the problems of ISO 16128 guidelines?

ISO 16128 guidelines lack specificity in 3 main points that differ them from private NOC standards:

#### 1. General lack of transparency for consumers

Unlike private standards, which are free and openly accessible to the public, ISO 16128 is only accessible through purchase. Moreover, purchasing the guidelines do not clarify how they are used in practice.

#### 2. Permitted ingredients

**Natural ingredients** - ISO 16128 guidelines do not oblige producers to restrict the use of artificial (“man-made”) ingredients such as those coming from petrochemical sources and genetically modified plants (GMOs). A footnote included in ISO 16128-1 stating that in certain parts of the world GM plants can be considered natural clearly shows that ISO 16128 guidelines are inconsistent with a harmonized approach and with the principles of the NOC sector of the cosmetics industry. Such criteria do not meet consumers’ expectations, who do not expect artificial ingredients to be permitted in NOCs. ISO 16128 guidelines risk contributing to consumer confusion and do not help to combat greenwashing as the criteria within private standards do. Consumers can

<sup>1</sup> ISO 16128-1 - Guidelines on technical definitions and criteria for natural and organic cosmetic ingredients and products - Part 1: Definitions for ingredients: <https://www.iso.org/standard/62503.html>

<sup>2</sup> ISO 16128-2 Guidelines on technical definitions and criteria for natural & organic cosmetic ingredients and products - Part 2: Criteria for ingredients and products: <https://www.iso.org/standard/65197.html>



## NATRUE Organization - Statement

---

be reassured that most established private standards for NOCs guarantee tight restrictions and prohibitions for ingredients from petrochemical sources and GMOs, as it's the case of NATRUE's standard.

Furthermore, the current ISO 16128 guidelines allow for up to half of an ingredient (by weight) derived from a natural starting material to come from petrochemical sources.

**Organic ingredients** - Although ISO 16128 guidelines define what are considered as "organic" ingredients, there is no requirement for the use of a recognised harmonised system to indicate what defines a raw material as "organic". In fact, ISO 16128 provides derogations to differences at (inter)national level, which results in different levels of organic.

### 3. Products verification, certification and identification

**Products verification** - ISO 16128 guidelines do not provide any information on the substantiation of claims referring to NOC products. It does not include either criteria to determine at what content percentage a product can (or cannot) be classified as "natural" or "organic".

**Products certification** - ISO 16128 guidelines do not set any obligation for certification and authentication of natural or organic ingredient content. Such certifications are voluntary.

**Products identification** - As ISO logo is not permitted for use, there is no verification logo or seal on a product to assure compliance and authenticity to consumers. As the results of the [study commissioned by NATRUE to GfK in 2016](#) show, over 60% of consumers are reassured by the presence of a label on natural and organic cosmetics, so this is an important reference for them to easily verify their authenticity.

### How can the ISO 16128 guidelines be used at European level?

ISO 16128 guidelines remain a voluntary scheme. However, there are several possible routes for the ISO 16128 guidelines to be enforced at European level:

- **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 allow products to use any legally permitted petrochemical-based ingredients as well as ingredients produced from or by GMOs, which cannot be included in the formulation of a natural and organic product under NATRUE's standard. Unlike a product certified to the NATRUE Label criteria, consumers purchasing a product presenting itself as natural or organic, as supported by the organic content calculated according to ISO 16128 guidelines, may unknowingly be misled since there is no guarantee this product would not contain natural quality ingredients from GMOs. Equally there is no basis to check whether organic grade raw materials have been used since there is no official regulatory definition for an organic substance for cosmetics; only that given in private standards. Consequently, the presentation of a product as organic but containing substances inconsistent with that term would sharply differ from consumer expectations.



# NATRUE Organization - Statement

---

## NATRUE's position

NATRUE believes that ISO 16128 guidelines have unfortunately fallen short of current private standard's requirements and that they are weaker than existing private European standards of NOCs, which thousands of consumers trust as a reliable reference for quality, transparency and authenticity. The broad derogations and flexibility of ISO 16128 guidelines fail to effectively combat greenwashing and risk contributing to misleading claims and consumers confusion. For these reasons, NATRUE believes that the use of ISO 16128 guidelines do not provide the same guarantees and transparency to reassure consumers and meet their expectations as current private standards such as NATRUE's one do.

NATRUE strongly believes that consumers must not be misled by products claiming to be "natural" and "organic" without rigorous criteria that support these claims. Claims that are not substantiated by strict and transparent standards confuse consumers and can undermine the reputation of producers, affecting the credibility of the NOC market as a whole.

## Consumer studies

Early 2021 NATRUE commissioned a consumer study to analyse consumer expectations and perception about cosmetic brands, as well as seals and claims used often to characterize natural and organic cosmetics, in order to support the sector, including NATRUE's members and Label Users. The study, which compiles the results of a quantitative online survey carried out in Germany and France between January and February 2021, evaluates three pillars: consumer attitudes, brand perception and seal performance. A representative mix (70% female, 30% male; aged between 18 and 65 years old) of over 1000 consumers from Germany and France, respectively, took part. Around 30 brands (conventional, nature-inspired, and natural or organic) were reviewed by the participants. The conclusions of this study are available for download in NATRUE's website [here](#).

This study concluded that, in the absence of an official regulatory definition or EU harmonised criteria indicating how the claims "natural" or "organic" are applied to cosmetic products, some consumers might be struggling to identify which elements contribute precisely to the "naturalness" of a product. Some consumers might indeed not be able to unambiguously differentiate between nature-inspired and natural products, particularly in the French market in comparison to the German one, where knowledge and awareness about NOCs seems to be higher.

The presence/avoidance of certain ingredients remains an important factor for consumers when assessing the level of "naturalness" of a product (for instance, the presence of natural ingredients; the absence of microplastics, GMOs, etc.). This particular need cannot be met by the ISO Guidelines as they do not oblige producers to restrict the use of artificial ("man-made") ingredients such as those coming from petrochemical sources and genetically modified plants (GMOs).

Information and clearer communication about the seals and labels on products, including their purpose, the criteria they follow and their guarantees, can guide consumers and help them identify more easily those verifiable qualities they are looking for in their cosmetics. More regulation can also certainly help to clarify claims used in the cosmetic market. When asked about the level of regulation regarding natural and organic cosmetics in the market in NATRUE's consumer study, consumers from Germany and France almost equally (60% in Germany and 65% in France) consider that EU politics are too passive regarding the regulation of natural and personal beauty care products.