



# **NATRUE Technical Guide**

# Manual on the scope of application and interpretation of the NATRUE Criteria

This manual is prepared by NATRUE and approved by the NATRUE Scientific Committee<sup>1</sup>. It serves as explanatory tool and collection of verified examples for interpretation and case-by-case application of the NATRUE Criteria to cosmetic raw materials and finished products.

<sup>&</sup>lt;sup>1</sup> https://natrue.org/who-we-are/organisation/



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# **GENERAL**

## A. Glossary

Terms referred to in this document can be found in Annex E to the NATRUE Agreement on the Usage of the NATRUE Label found <a href="https://example.com/here">here</a>.

#### **B.** Abbreviations

Noted abbreviations included in this document include:

DNS = Derived Natural Substance

FP = Finished Products

GM = Genetically Modified

GMM = Genetically Modified Microorganism

GMO = Genetically Modified Organism

NAC = NATRUE Approved Certifier

NIS = Nature-Identical Substance

NS = Natural Substance

NOC = Natural and Organic Cosmetics

PO = Palm Oil

PKO = Palm Kernel Oil

RM = Raw Material

RSPO = 'Roundtable on Sustainable Palm Oil' 2,3

RSPO-MB (Certification) = RSPO supply chain model Mass Balance (MB)<sup>4</sup>

SC = Scientific Committee

#### C. NATRUE Raw Materials Scheme

#### What is the Raw Materials Scheme?

The scheme provides a framework for third-party verification of raw materials according to the criteria and characteristics defined in the internationally appliable NATRUE Standard. Raw materials that are verified are issued certificates of compliance by a NAC and are publicly listed on the NATRUE database to facilitate formulators of certified natural and organic cosmetics.

#### What do I need to know?

The scheme was introduced in February 2020 and establishes defined transition periods for new and existing finished products.

<sup>&</sup>lt;sup>2</sup> https://rspo.org/who-we-are/

<sup>&</sup>lt;sup>3</sup> https://rspo.org/as-an-organisation/certification/

<sup>4</sup> https://rspo.org/as-an-organisation/certification/supply-chains/



#### For producers of finished products (new / reformulated products):

Applicants must submit their intention to certify a product to their NAC by 30th June 2024 for finished products containing raw materials not yet approved or certified.

Applications made after 1st July 2024 for newly certified finished products (issuing a preliminary certificate) will have to include only approved or certified raw materials.

#### For producers of finished products (existing products):

A 'grandfathering' approach applies to existing finished cosmetic products where the certified formulation remains unchanged and still compliant with the label criteria if re-certified from 1st July 2024. Application of the grandfathering rule means that in an unchanged and compliant formulation not every raw material needs to have been approved or certified (e.g., listed on the NATRUE database) for the finished cosmetic product to be recertified. Adjustments to artwork / final artwork, claims or the INCI listing without changing the recipe (e.g., extension of declarable allergens or other legal adjustments) also fall under this approach.

If a new (changed) formulation is presented to the NAC, then the conditions for new / reformulated products indicated above applies. A new formulation includes a new substance (exception: allergen declaration) or modification of an existing formulation.

If a certified product requires a replacement raw material due to supply chain bottlenecks or cancellation by the supplier ("force majeure"), the replacement raw material must comply with the standard but does not have to approved or certified (e.g., listed on the NATRUE database) in advance. If the approval or certification of the alternate raw material is initiated and submitted within 12-months, then certification of the finished product is maintained. A further 6-month extension may be granted by NATRUE (Board) by considering the validity of the request based upon criteria including the lack of technical alternatives on the market or adequate provision of documentation.

#### Who can initiate the Scheme?

To assist their customers RM producer, trader or wholesaler may apply for the Approval/Certification of the raw material.

Alternatively, the FP manufacturer using a particular raw material may also initiate the process for Approval/Certification by either:

- I. The FP manufacturer initiates the scheme for a raw material(s) and the RM producer, trader, or wholesaler signs the LUA. The NATRUE Label fee can be paid by either the RM producer, trader or wholesaler or the FP manufacturer by internal agreement (or)
- II. The FP manufacturer initiates approval or certification of a raw material provided that the RM producer, wholesaler, or trader meets the definition of a <u>SME</u> and signs a LUA. This applies to new and existing raw materials on the market.

The eligible party signing the Label Usage agreement (LUA) is responsible for compliance of the product to the NATRUE Label Criteria.



## Costs of Approval/Certification

- Procedural costs related to Certification/Approval by NACs are invoiced directly by the certifier.
- The NATRUE Label fee is invoiced directly by NATRUE to the eligible party signing the LUA (Label Usage Agreement).

More details, helpful documents and costs of the **NATRUE's Raw Materials Scheme** can be found under the section "Certification and approval process" at NATRUE's website.

## Raw Materials: Acceptance, Approval or Certification

Raw materials are approved or certified depending on their constituents and compliance with the NATRUE label criteria. Raw materials for **cosmetic end use** are assigned for approval, certification or acceptance according to the flow chart, Annex 3.2, and details below.

### Acceptance (exceptions from mandatory application of the scheme)

In all cases below, Approval (or Certification, where applicable) remains a voluntary option and it is **not necessary** that a raw material(s) enter(s) the Approval or Certification process (e.g., listed on the NATRUE database), but any raw materials used in a finished cosmetic product undergoing NATRUE certification must be compliant with NATRUE label criteria.

- a) Unprocessed plants not listed <u>here</u> or in Appendix B (High-Risk List) to the <u>non-GMO Project</u> standard (e.g., in cases where FP manufacturers prepare customised extracts in-house).
- b) Raw materials consisting only of inorganic minerals (*cf.* nature-identical and conform natural substances) that are compliant with the Standard. Substances on Annexes 2 and 1C (*cf.* nature-identical pigments and minerals; inorganic salts) are accepted by default when listed<sup>5</sup>.
- c) Nature-identical preservatives are accepted by default when listed in Annex 4a.
- d) Food-grade natural (non-organic) and food-grade organic raw materials certified to a Regulation or Standard listed in the IFOAM Family of Standards.<sup>6</sup>
- e) Non-food grade organic raw materials (entirely or partially of organic constituents) with an analogous organic certificate (control equivalent to a standard/regulation in the IFOAM Family)
- f) Non-food grade organic raw materials consisting entirely of organic constituents e.g., 100% organic non-food grade plant oil) certified to an organic standard operating under third-party certification and external accreditation system for certification bodies (based on all requirements of ISO/IEC 17065).
- g) Customised raw materials <sup>7</sup> including botanical extracts manufactured in-house from unprocessed plants or those produced by subcontractors on an exclusive basis (i.e., raw

<sup>&</sup>lt;sup>5</sup> The compliance of these raw materials is evaluated by the NAC when this raw material is used in the finished product undergoing NATRUE certification.

<sup>&</sup>lt;sup>6</sup> 'food' means food as defined in Article 2 of Regulation (EC) No.178/2002 and includes 'food additive' as defined in point (a) of Article 3(2) of Regulation (EC) No. 1333/2008.

<sup>&</sup>lt;sup>7</sup> The compliance of these raw materials is evaluated by the NAC when this raw material is used in the finished product undergoing NATRUE certification. To ensure correct allocation, the finished product manufacturer (including contract/third-party manufacturers) must clearly communicate and provide evidential support to their NAC that the customised raw material is an exclusivity to qualify for the exemption (i.e., not freely available on the open market). Customised raw materials sold exclusively between one supplier and one (third-party)



materials not sold on the open market but only to individual FP manufacturers uniquely – including, but not limited to, customised fragrance blends).

h) Pharmaceutical grade raw materials (e.g., USP-NF, Ph.Eur., BP, JP as referenced by the WHO).

In these cases, if the raw material producer, wholesaler, or trader communicates on NATRUE compliance and/or chooses to use the NATRUE Label, then the raw material will need to be approved or certified.

#### Approval

Involves a one-step verification by a NAC by documentation review (without a production site audit) and is applicable for:

- (i) compliant raw materials consisting of natural and/or derived natural substances (*cf.* Annex 3 and 4b) not from organic agricultural origin.
- (ii) non-food raw materials not entirely (partially) composed of organic constituents that have been certified to an organic standard operating under third-party certification and external accreditation system for certification bodies (based on all requirements of ISO/IEC 17065)<sup>8</sup>.

#### Certification (presence of organic constituents)

Raw materials entirely or partially composed of organic constituents require a two-step verification by a NAC [(1) documentation review; (2) production site audit] if they are not (a) accepted automatically as an exception from application of the scheme or (b) the raw material organic quality is accepted and evaluated through approval as described above.

#### How do I re-approve a raw material?

When renewal occurs an attestation of no-change for approved raw materials is accepted, and fees attributed to the NAC and NATRUE label fee are invoiced. A period of 6 years is applicable between full reviews i.e.:

New raw material has1st period document check  $\rightarrow$  2nd period attestation  $\rightarrow$  3rd period attestation  $\rightarrow$  4th period documentation check [each period = 2 years]  $\rightarrow$  after 6 years a full review is required.

# D. RMDF - a tool for evaluating substances

The Raw Material Documentation File (RMDF) is <u>not</u> mandatory to complete but acts as a voluntary tool that can facilitate the NAC when assessing a raw material for its compliance with the NATRUE standard. The RMDF assists the evaluation of compliance and classification of a substance(s) by identifying characteristics likes origin and manufacture of the raw material, including specific solvents, processing aids and additives used during various stages of the process, as well as any potential residues.

manufacturer, even if used in multiple brands, qualifies as customised as this maintains exclusivity. Customised raw materials do not need to be displayed on the NATRUE raw material database list.

<sup>&</sup>lt;sup>8</sup> In these cases, the organic certificates serve only as acceptable evidence of the organic quality, and all the other raw material compliance requirements including calculation of natural/organic content and manufacture must be independently verified as compliant with NATRUE criteria and its annexes.



A guidance document for the RMDF is found on the NATRUE website in each relevant section (raw materials, products, formulas) <u>here</u>. Examples of standardised supporting documentation referenced in the RMDF (*cf.* non-GMO certificates; ISO 9235 conformity) can be found <u>here</u>.

# **RAW MATERIALS**

#### A. Evaluation

## Organic ingredients: acceptance criteria for certificates

As an open interpretation of Section 2.2 of the NATRUE Criteria V3.9, the acceptance criteria for organic certificates can be extended to organic standards operating under third-party certification and external accreditation system for certification bodies (based on all requirements of ISO/IEC 17065), besides the NATRUE standard and the standards and regulations of the IFOAM family. Certificates serve as acceptable evidence of the organic quality for raw materials that are entirely or partially composed of organic constituents, however all the other raw material compliance requirements including calculation of natural/organic content, manufacture, certification or approval must be independently verified as compliant with NATRUE criteria and its annexes.

## GMOs, GMMs, and Enzymes

The NATRUE Standard reference for a Genetically Modified Organisms (GMOs) follows the definition in Directive 2001/18/EC. The non-GMO compliance criteria prohibits the use of raw materials that are produced either "from" or "by" GMOs as those terms are defined in Regulation (EU) 2018/848 (Article 11). By signing a non-GMO declaration meeting the NATRUE requirements, the supplier or manufacturer has understood the compliance criterion.

#### Example 1



**Evaluation:** This Glucose is "from GMOs" (i.e., from genetically modified corn), then is not compliant.

#### Example 2





**Evaluation:** This Hyaluronic Acid is obtained "by GMOs" (i.e., the fermentation is performed by a GM microorganism) and is therefore not compliant.

# Example 3 Enzyme from GM microorganisms non-GM corn Starch Glucose

**Evaluation:** This Glucose is produced by enzymatic reaction using an enzyme isolated from a recombinant microorganism (GMM). In this case, according to the provisions in sect. 2.3 of the Criteria, Glucose is compliant due to current technical unavailability of alternatives and/or for improved sustainability and has to be classified as Derived Natural substance as by the clarification given in sect. 3.3 of the Criteria (cf.: "The substance is classified as derived natural in all cases where [...] the reactions are performed using an enzyme(s) isolated from recombinant microorganisms").

#### Example 4



**Evaluation:** Where one intermediate of the process is obtained using a GM microorganism, then the final product, Cinnamic Acid, is non-compliant.

#### Please note that:

 A non-GMO declaration is not required for inorganic pigments and minerals (natural or natureidentical substances) and nature-identical preservatives.

## Sustainable Palm (Kernel) Oil and its derivatives

Derived natural substances from palm (kernel) oil that are available in RSPO-MB quality are listed in Annex 3 with a "X" adjacent to the INCI. Three different scenarios may apply for Certificates provided with a raw material:

#### 1. Certification of the whole raw material:

 the RSPO-MB certificate should primarily refer to the whole raw material (as commercial item under the final raw material brand, which may include both PO/PKO-derived and non-PO/PKOderived ingredients).

#### 2. Certification of single substances from PO or PKO within a raw material:

- If the certificate for the whole raw material (i.e., case 1) is not available, the sustainable palm oil (cf. RSPO-MB) certificate should reflect the single PO/PKO-derived ingredient(s) within the raw material.
- 3. <u>Certification of building blocks from PO or PKO used to produce the substance within a raw</u> material:



 If the certificate is not available either for the palm-derived ingredient(s) (i.e., case 2), then the RSPO-MB certificate should be referred to the specific palm-derived substance(s) used as building block, or carbon source for fermentation, to produce the ingredients.

For supporting guidance on sustainable palm (kernel) oil compliance of raw materials used in finished product formulations, please find the RSPO decision tree on this <u>link</u> of the NATRUE website.

## Ethanol (INCI: Alcohol)

#### Qualities:

Natural (i.e., produced by fermentation of non-GM plant origin carbohydrates with non-GM microorganism) or certified organic quality ethanol are compliant for use. Other qualities of ethanol (e.g., from conversion of CO<sub>2</sub>) are not accepted.

#### **Denaturants**

Denatured ethanol is only accepted if the denaturants are compliant NS, DNS or NIS.

#### **Extraction Solvent**

When alcohol is used as a solvent for botanical extractions, Annex 6 applies. If the supplier provides percentages in volume (ml or l) instead of weight (g or kg), the conversion using density (g/ml = kg/l) should be applied, for a correct calculation. Please find the following example for ease of calculation.

#### Example: Chamomile Extract

Chamomile dry flowers: 50 kg

Water: 74,26 litres

Ethanol 96% (v/v): 80,76 litres

Conversion of Water and Ethanol volume into weight:

- At 20°C, water density is 0,998 kg/l which can be approximated to 1.
- At 20°C, density of pure ethanol (100%) would be 0,789 kg/l.
- "Ethanol 96% (v/v)" consists of 96% ethanol (classifiable as NS, if compliant) and 4% of water.
- So, 80.76 l of "Ethanol 96% (v/v)" consists of 77,53 l (= 96% of 80,76 l) of pure ethanol and 3,23 l (= 4% of 80,76 l) of water.
- Total water volume:
  - 74,26 I (water added in the formula) + 3,23 I (water in ethanol) = 77,49 I
- Pure ethanol weight: (77,53 l \* 0,789 kg/l) = 61,17 kg
- Total water weight: (77,49 l \* 0.998 kg/l) = **77,33 kg** (or 77,49 kg if conversion is not made).

When calculating the natural portion of the chamomile extract, the values used would be:

Chamomile dry flowers: 50 kg

Water: 77,33 kg

Pure ethanol: 61,17 kg

The natural portion can be calculated according to Annex 6:



Natural portion: 
$$(P_{natural} + E_{natural}) / (P_{total} + E_{total}) * 100 = X %$$
  
  $X \% = (50 + 61,17) / (50 + 61,17 + 77,33) * 100 = 58,97\%$ 

P = weight of the plant material used (organic, if applicable);

E = weight of the extraction medium used or of the water used for distillation.

#### Derived natural substances: clarification

Derived natural substances used in finished cosmetic products cannot be semi-synthetic (i.e., substances consisting of both natural and synthetic moieties). An illustrative list of non-compliant derivatives by INCI are indicated below<sup>9</sup>:

- Guar Hydroxytrimonium Chloride
- Cocamidopropyl betaine
- Carboxymethyl cellulose

## (Nature-identical) minerals: clarification

Details of manufacture is not required for inorganic substances that are classified as NIs. These substances may be automatically used when listed on Annex 2.

## Substances used for extracting and processing

#### **Natural Substances:**

Table 2 of Annex 1a contains a list of natural substances where non-natural or non-derived natural solvents may be used provided that there is no alternative option offered by the latest technology. After use, such substances must be completely removed or reduced to a level deemed as technically unavoidable traces, and their final concentration must be documented. The reference for the acceptable residual solvent level is the 'ICH guidelines for residual solvents' and/or to Regulation or scientific literature reporting the state-of-the-art practices.

Please find below a list of extraction and purification agents approved by the NATRUE Scientific Committee for processing specific NS ingredients. Such lists can be considered as supplementary to Annex 1a.

# Solvent Inventory (natural substance extraction)

INCI	SOLVENT PERMITTED	RESIDUE PERMITTED	REASON FOR USE
Acmella Oleracea Extract	Hexane	< 1 ppm	Extraction
Bakuchiol	Synthetic solvents	≤ 100ppm (total)	Extraction
Capsicum Annuum Fruit Extract (fraction rich in Capsanthin/ Capsorubin): vegetable pigment.	Hexane	<25 ppm	Extraction

<sup>&</sup>lt;sup>9</sup> Synthetic moieties are reported in red and natural moiety are in green.

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Carrageenan	Isopropanol	0,5% in the final RM (where carrageenan is ~10%)	Purification (Precipitation)
Grapeseed oil	Hexane	< 1 ppm	Extraction
Helianthus Annuus Seed Wax	Hexane, Isopropyl Alcohol	< 1 ppm (each solvent)	Extraction
Lecithin	Hexane	information pending	Extraction
Olea Europaea Kernel Meal	Hexane	< 1 ppm	Purification (degreasing)
Olea Europaea Seed Powder	Hexane	< 1 ppm	Purification (degreasing)
Pectin	Isopropanol	0,5% in the final RM (where pectin is ~60%)	Purification (Precipitation)
Rice Bran oil	Hexane	< 1 ppm	Extraction
Rice Bran wax	Hexane	< 1 ppm	Extraction
Safflower seed oil	Hexane	< 1 ppm	Extraction
Tamarindus Indica Seed Gum	Isopropanol/Isopropyl alcohol/2-propanol	< 100 ppm	Extraction
Tocopherol	Hexane	< 1 ppm	Extraction
Triticum Vulgare Germ Oil	Butane	< 10 ppm	Extraction
Triticum Vulgare Germ Oil	Hexane	< 1 ppm	Extraction
Unsaponifiables	Hexane	< 1 ppm	Extraction
Wheat germ oil	Hexane	< 1 ppm	Extraction

# Ion exchange resins

Irrespective of origin (natural or synthetic composition), ion-exchange resins used for purifying natural substances are permitted and do not require pre-approval from NATRUE provided they are removed.

# **Compliant Fragrance Materials**

Aromatic raw materials found in fragrance mixtures used in cosmetic products must both conform to ISO 9235 and be natural substances according to NATRUE criteria – please refer to the Perfume Decision Tree found <a href="https://example.com/here.">here.</a>

(semi)Synthetic and derived natural fragrances cannot not be used.

To facilitate the NAC assessment of fragrances, the supplier can choose to provide information by completing the self-declaration form found here.

# Ingredients given by percentage range

When the composition of a raw material is provided by the supplier as percentage range instead of by its exact percentage, the worst-case scenario must be applied i.e., the lower bandwidth of natural content and the higher bandwidth of derived natural content.



#### Example:

#### **Rosemary extract** where composition is provided by the supplier as following:

(natural) Alcohol: 15 - 25%

Rosmarinus Officinalis Leaf Extract: 1 - 5 % Glycerin (by saponification): 10 - 20 %

Sodium Benzoate: 0,5% Potassium Sorbate: 0,5%

Water: 50 - 60%

#### NATRUE ingredient classification (where worst-case scenario is applied):

Alcohol: 15% natural (= lower bandwidth)

Rosmarinus Officinalis Leaf Extract: 1% natural (= lower bandwidth)

Glycerin: **20% derived natural** (= higher bandwidth)

Sodium Benzoate: 0,5% nature-identical Potassium Sorbate: 0,5% nature-identical

Water: 63% (since water is neutral, it can be used to rebalance to 100).

#### Final rosemary extract composition:

Natural: (15% + 1%) = 16%

Derived natural: 20%

Nature-identical: (0.5% + 0.5%) = 1%

Water: 63%

(Total: 100%)

# FINISHED PRODUCTS AND FORMULAS

The following pages on the NATRUE website provide information on the process to obtain the NATRUE label:

- How can you certify your finished cosmetic product
- How can you approve your formulas

# A. Product Category Evaluation

Table 1 from Section 9 of the NATRUE Criteria establishes 13 product categories:

- 1. Oils/water-free cleaning and skin care products
- 2. Parfums, Eaux de Parfum, Eaux de Toilette, Eaux de Cologne



- 3. Skin care emulsions (W/O) and Oleogels
- 4. Decorative cosmetics containing water
- 5. Deodorants and antiperspirants
- 6. Skin care emulsions (O/W) and gels
- 7. Sunscreens
- 8. Hair treatment products
- 9. Cleansing products containing surfactants
- 10. Oral care
- 11. Decorative cosmetics, water-free
- 12. Soaps and solid cleaning and haircare products
- 13. Waters

#### How to assign your product category:

The general criterion between categories relates to the primary function of the product, which is more important than formulation. If one product can fit in two or more category, the NAC has to choose the strictest category of the two. In case of doubt NATRUE should be contacted and the NATRUE Scientific Committee may decide.

#### Illustrative (non-exhaustive) examples of products classified by category:

- Category 1<sup>10</sup>: typically for body oil; a lip balm product with a high quantity of pigments; Pomade (extra-virgin olive oil, beeswax, alcoholic plant extract, dried flowers, alcoholic myrrh extract, lemon essential oil, hypericum oil); bath salts
- Category 3: Baby Diaper Cream; skin cream which does not contain any water (aqua), but consist of oils, extract, beeswax, natural emulsifier, silica and natural fragrance can be certified under, although there is no water inside.
- Category 8: Shaving cream
- Category 9: Facial toner **except** if the toner does not contain surfactants (Category 6)
- Category 10: Mouth Wash; toothpaste
- Category 11: Nail polish remover **except** if it contains surfactants (Category 9).
- Category 12: Bath bombs
- Category 13: Floral waters and steam distilled plant extracts.

For Cosmetic Kits (*cf.* as described in Section 3.5.6 of the European Commission's <u>Borderline Products Manual</u>) where a dry/waterless product (at point-of-sale) has to be mixed with water by the consumer for end use, the formula at point-of-sale is considered for the categorisation according to

<sup>&</sup>lt;sup>10</sup> If water is contained in alcohol, but the total content of water is below 5% in the final product, the product is regarded as product Category 1.If water content is higher, the product should be regarded in other categories.



Table 1. In case of doubt or where if further information is presented by the manufacturer, NATRUE may be contacted for case-by-case decisions from the Scientific Committee.

## Calculation of the organic portion and certification level

Please refer to the following guidance documents found <a href="here">here</a>.

## List of approved carrier materials

A non-exhaustive list of compliant carrier materials (wet wipes, pads, etc.) consistent with the requirements in Section 7.1 of the NATRUE criteria includes:

- Cotton or Cellulose, if they have compliant origin and manufacture to qualify as natural or derived natural substances.
- Lyocell [e.g. Nonwoven (100% Tencel fiber)] if the solvent residue limit (cf. for NMMO N-Methylmorpholine N-oxide) is below 100 ppm.
- Viscose, if CS<sub>2</sub> used for the process is removed, and the final substance is compliant with the definition of derived natural substances.
- Cuprammonium Rayon, if the copper-ammonia solution is removed and the final substance is compliant with the definition of derived natural substances.

Other carrier materials not on this list will be evaluated by the NAC for compliance.

# **FORMULAS**

Third-party manufacturers who wish to sell their formulations to brand owners (B2B) can request the Approval of the Formula as a voluntary option. A finished product made with an Approved formula is not automatically certified: each finished product of every brand (B2C) must be Certified to bear the NATRUE label.

# A. NATRUE Database (raw materials)

All NATRUE approved or certified raw materials are listed in <u>NATRUE's public database</u>. This procurement database provides raw material producers with a platform to advertise their products whilst informing and assisting manufacturers wishing to certify finished products with the NATRUE Label.

# **Database Representation**

Each raw material is listed in the database by its:

- name (raw material trade name)
- manufacturer
- composition (according to NATRUE<sup>11</sup>)

<sup>&</sup>lt;sup>11</sup> The 'Composition' field should reflect the actual composition of the raw material according to their NATRUE classification term, including additives and substances that may not be present in the official INCIs declared by the supplier. The sum of the percentages (NS, DNS, NIS, Water) listed in the 'Composition' field must be 100%. Inorganic salts listed on Annex 1C may be included into the 'Water' category since they are treated as neutral.



- INCI (the official INCI declared)
- status (approved or certified)
- expiration (date of the expiration of the certificate).

#### **Organic Content**

In the composition field, natural and derived natural portions may include organic content. In this case, the organic content is represented in parentheses and refers to the natural (or derived natural) portion not to the whole RM composition.

#### Illustrative Example:

Mint Extract, INCI composition: Glycerin\* (45%), Aqua (42,5%), Mentha Piperita Leaf Extract\* (12%), Potassium Sorbate (0,25%) Sodium Benzoate (0,25%). (\*Organic certified quality)

Case (a) – correct representation on the database:

12% Natural (100% Organic)

45% Derived natural (98% Organic)

0,5% Nature-identical

42,5% Water

Case (b) - wrong representation on the database:

12% Natural (12% Organic)

45% Derived natural (44,1% Organic)

0,5% Nature-identical

42,5% Water