



# 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.

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



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## A. GENERAL

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### A.1. Glossary

Terms referred to in this document can be found in Annex E to the NATRUE Agreement on the Usage of the NATRUE Label (i.e., 'NATRUE's Glossary') found [here](#).

### A.2 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
- LUA = Label Usage Agreement
- 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' <sup>2,3</sup>
- RSPO-MB (Certification) = RSPO supply chain model Mass Balance (MB)<sup>4</sup>
- SC = Scientific Committee
- SME = Small and medium-sized enterprises<sup>5</sup>
- TPM = Third-Party Manufacturer

## B. RAW MATERIALS

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### B.1. NATRUE Raw Materials Scheme

#### B.1.1. 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 applicable NATRUE Standard. Raw materials that are

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

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

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

<sup>5</sup> [https://single-market-economy.ec.europa.eu/smes/sme-fundamentals/sme-definition\\_en](https://single-market-economy.ec.europa.eu/smes/sme-fundamentals/sme-definition_en)



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.

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

#### **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, unless the raw materials are exempt from mandatory approval/certification, as outlined in section B.1.4 below.

#### **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 1<sup>st</sup> July 2024. Application of the grandfathering rule means that in an unchanged and compliant formulation, raw materials do not need to be Approved or Certified (e.g., listed on the NATRUE database) for the finished cosmetic product to be recertified. Adjustments to the artwork / final artwork, claims, or the INCI listing without changing the recipe (e.g., extension of declarable allergens or other legal adjustments) are also covered by 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 modification of an existing formulation. However, certain types of changes allow the product to maintain its "grandfathered" status as by the rules below:

##### **B.1.1.1 Formula changes accepted for a product to keep its 'grandfathered' status and application rules:**

1. If RMs in the formula are exactly the same (same RM names, same suppliers, same INCI composition) but the percentage of (at least) one RM changes → the product is still grandfathered.
2. If the RM name changes, but producer, quality and composition are the same → the formula is still grandfathered.
3. If the supplier change, but the RM producer is the same → the formula is still grandfathered.
4. If the RM producer changes (= same RM composition but produced from another company) → the formula can be grandfathered **but** the new RM must be Approved/Certified.
5. If a RM is added, removed or replaced → the formula can be grandfathered **but** the new RM must be Approved/Certified.
6. If a RM is added, removed or replaced and the percentage of the other ingredients changes as a result → the formula can be grandfathered **but** the new RM must be Approved/Certified.
7. If (at least) one substance in the composition of a RM is added, removed or replaced → the formula can be grandfathered **but** the new RM must be Approved/Certified.
8. If a TPM produced an "old" formula for brand X (i.e., certified before 30<sup>th</sup> June 2024), but is now producing the same unchanged formula for a new brand Y → The formula can retain its



'grandfathered' status for brand Y provided that all other rules in Section B.1.1.1 still apply (e.g., if a RM is added or replaced, the formula remains 'grandfathered', but the new RM must be Approved/Certified).

9. 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 be approved or certified (e.g., listed on the NATRUE database) in advance. If the approval or certification of the alternative 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.

### B.1.2. 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 [SME](#) and signs a LUA. This applies to new and existing raw materials on the market.

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

### B.1.3 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.

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.

### B.1.4 Raw Materials: Acceptance, Approval or Certification

Raw materials for **cosmetic end use** are assigned for approval, certification or acceptance depending on their constituents and compliance with the NATRUE Label Criteria and Scheme.



### Acceptance (exemptions 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 [here](#) or in Appendix B (High-Risk List) to the [non-GMO Project](#) 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>6</sup>.
- c) Nature-identical preservatives are accepted by default when listed in Annex 4a.
- d) Food-grade raw materials <sup>7</sup>.
- e) Organic raw materials certified to a Regulation or Standard listed in the 'NATRUE family of Standards' according to the requirements at point B.2.4 of this Guide.
- f) Customised raw materials <sup>8</sup> including botanical extracts manufactured in-house from unprocessed plants or those produced by subcontractors on an exclusive basis (i.e., raw materials not sold on the open market but only to individual FP manufacturers uniquely – including, but not limited to, customised fragrance blends).
- g) Pharmaceutical grade raw materials (e.g., USP-NF, Ph.Eur., BP, JP as referenced by the [WHO](#)) <sup>9</sup>.

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.

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<sup>6</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>7</sup> A general definition of 'food' is found in Article 2 of Regulation (EC) No.178/2002. Food-grade raw materials can include those complying with Regulation (EC) No. 178/2002, including 'food additives' complying with Regulation (EC) No. 1333/2008 and/or Regulation (EU) No 231/2012, and 'food flavourings' complying with Regulation (EC) No. 1334/2008.

A self-declaration of compliance with the applicable regulations mentioned above is mandatory to prove the food-grade quality. Certificate of Analysis (CoA) confirming that the raw material meets the analytical criteria for being classified as food-grade is recommended, in case of uncertainty (CoA should include specific analytical parameters such as purity, contaminants, microbiological limits, and reference to the food safety standards used).

<sup>8</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) 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>9</sup> A self-declaration of compliance with the applicable standards mentioned is mandatory to prove the pharma-grade quality. Certificate of Analysis (CoA) confirming that the raw material meets the analytical criteria for being classified as pharma-grade is recommended, in case of uncertainty (CoA should include specific analytical parameters such as purity, contaminants, microbiological limits, and reference to the pharmaceutical standards used).

### B.1.5 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 has 1<sup>st</sup> period document check → 2<sup>nd</sup> period attestation → 3<sup>rd</sup> period attestation → 4<sup>th</sup> period documentation check [each period = 2 years] → after 6 years a full review is required.

## B.2. Raw Materials Evaluation

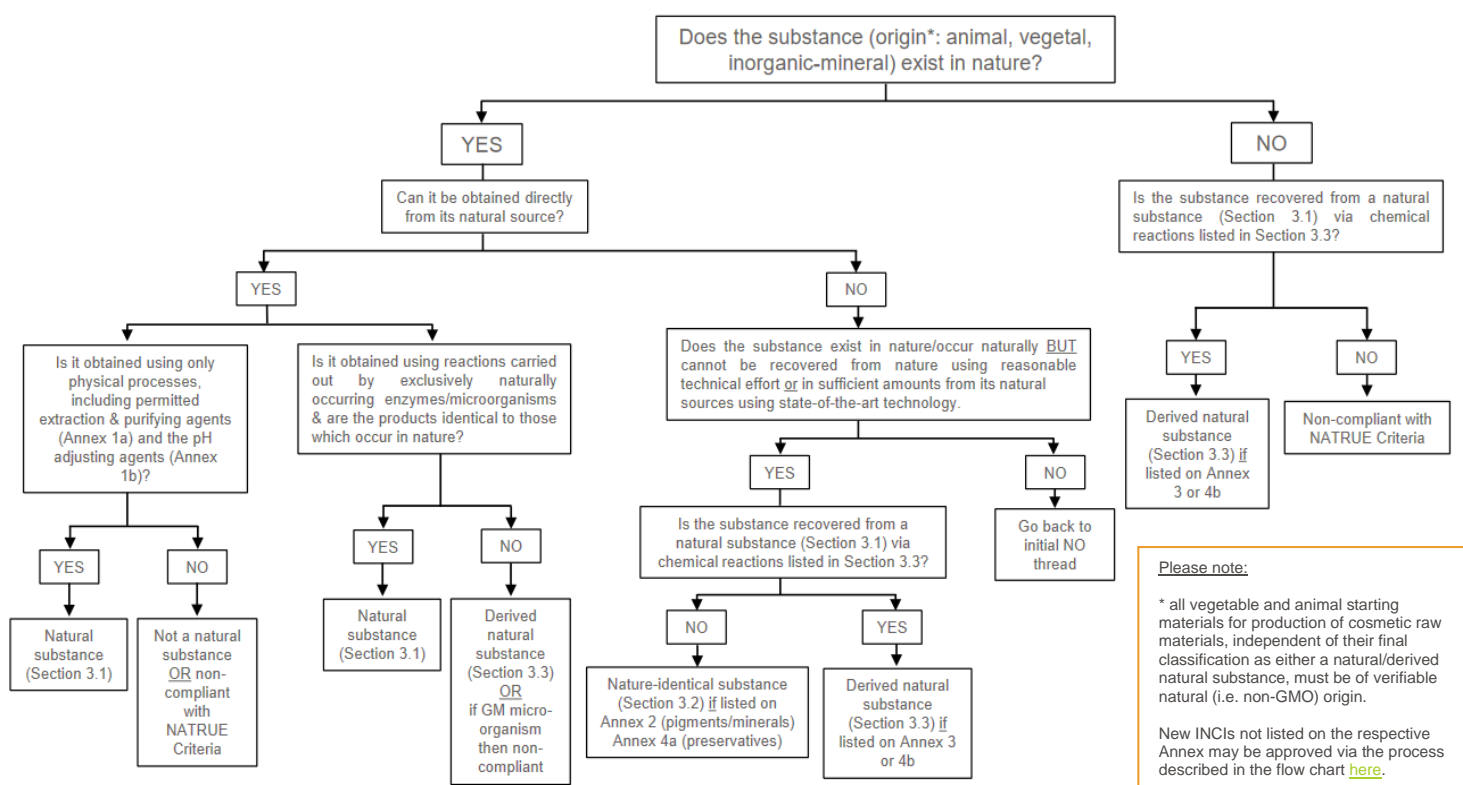
### B.2.1. RMDF – a tool for evaluating substances

The Raw Material Documentation File (RMDF) is **not** 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 like 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.

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

### B.2.2. Substance classification: decision tree

The flow-chart below may be a guidance for the classification of substances according to the NATRUE criteria. N.B. this is for informative purpose only (the Standard in its latest version has priority).





### B.2.3. Natural ingredients

Examples for the calculation of the natural (organic) portion of plant extracts and hydrolates / floral waters can be found in Annex 6 of the NATRUE Standard.

### B.2.4. Organic ingredients: which certificates?

Organic raw materials must come from controlled organic farming and/or wild collection, certified by a duly recognized third-party certification body or authority to an organic standard or regulation included in the following list:

#### NATRUE family of Standards

1. NATRUE Standard
2. Any standard or regulation listed in the [IFOAM Family of Standards](#).
3. UK Organic Regulation
4. Demeter Standard
5. COSMOS Standard

Certificates to the standards or regulations listed above can be accepted according to the following rules (please also see examples):

#### B.2.4.1 For raw materials composed entirely of organic constituents:

Certificates confirming the "100% organic" status are accepted, provided that the NAC verifies the organic components as 100% according to the NATRUE calculation (*cf.* Annexes 5 and 6 of the NATRUE criteria). No NATRUE Approval is required for those raw materials.

**Example:** Organic sunflower oil (100%)

The organic certificate to any of the standards of the NATRUE family is accepted after verification of the organic portion by the NAC. NATRUE Approval is not required.

#### B.2.4.2 For raw materials with an organic content of less than 100%:

- a. Certificates issued to standards or regulations from 2, 3 or 4 of the NATRUE family are accepted but the classification of the non-organic ingredients (e.g., water) and the calculation of organic content must be made according to the NATRUE rules (*cf.* Annexes 5, 6).  
No NATRUE Approval is required for raw materials covered by those certificates.

**Example:** Organic apple juice [INCI: pyrus malus juice, citric acid, water].

The certificate to the Regulation (EU) 2018/848 (one of the standards at point 2 of NATRUE family) is accepted provided that citric acid and water are correctly classified to NATRUE, and the organic portion is calculated according to the NATRUE requirements (*cf.* Annex 6). NATRUE Approval is not required.

- b. Certificates issued to standard 5 of the NATRUE family can only attest to the "organic quality" of the organic ingredients present but do not guarantee the overall compliance of the raw material. In such cases, all other requirements - such as the classification of the non-organic ingredients based on their origin and manufacturing process, the calculation of



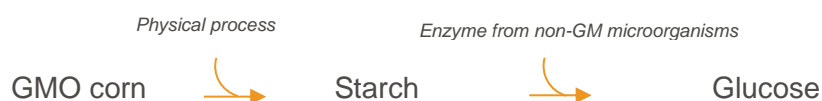
natural/organic content, production methods of the raw material, etc. - must be independently verified according to the NATRUE Criteria (including annexes) and Scheme.  
The raw material must be NATRUE Approved.

**Example:** Lemon extract [INCI: Water, Citrus Limon Fruit Extract (org), Glycerin (org), Pentylene Glycol]. The COSMOS organic certificate is accepted solely to confirm the organic quality of its constituents (e.g., the lemon extract and glycerin). However, the calculation of the organic portion must meet the requirements of Annexes 5 and 6, the whole manufacturing process of the extract must be checked, as well as the compliance of non-organic ingredients (e.g., Pentylene Glycol must be compliant to NATRUE criteria as derived natural substance). The ingredient must be NATRUE Approved.

### B.2.5. 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 prohibit 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



**Evaluation:** 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

*Fermentation with non-GM microorganism*

Glucose (by example 3 above)  Ethanol

**Evaluation:** If this ‘derived natural’ Glucose is used as a fermentation feedstock by a non-GMO microorganism, the resulting fermentation product (e.g., ethanol) can be classified as an NS, provided that the definition of NS is fulfilled.

The SC decision (26-11-2024) established that: whenever a living organism - whether a plant, cell, or microorganism - is involved in the biochemical transformation of a substance, the resulting product will be classified as a natural substance, as it reflects the organism's inherent physiology, regardless of the origin of the feedstock. Enzymes isolated from microorganisms do not have the same "right" (as the microorganisms themselves) to convert a DNS into a NS.

#### Example 5

*Fermentation of GM microorganism*

*Fermentation of non-GM microorganism*

Glucose (by example 3 above)  A  B

**Evaluation:** Where A is obtained using a GM microorganism, then the final product, B, is non-compliant.

#### Please note that:

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

### B.2.6. 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/PKO-derived ingredients).

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

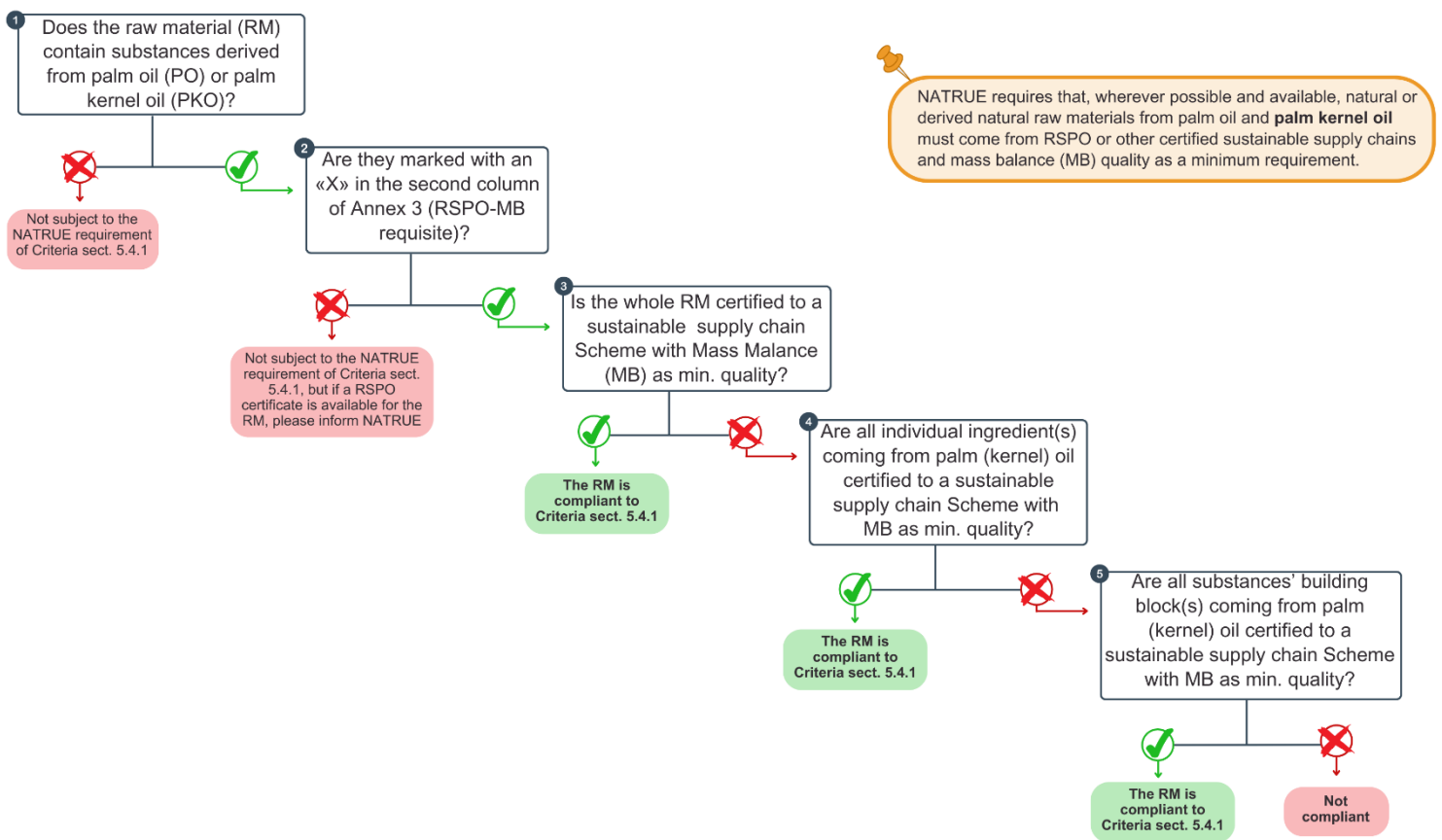
- If the certificate for the whole raw material (i.e., case 1) is not available, the sustainable palm oil (*cf.* RSPO-MB) certificate should reflect the single PO/PKO-derived ingredient(s) within the raw material.

3. Certification of building blocks from PO or PKO used to produce the substance within a raw 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 decision tree as following:

RSPO decision tree



**B.2.7. 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 l (water added in the formula) + 3,23 l (water in ethanol) = 77,49 l
- 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:

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

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

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

### **B.2.8. 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. Synthetic, semi-synthetic and derived natural fragrances cannot not be used. Please refer to the Perfume Decision Tree as following:

## Step 1: Does the substance meet NATRUE requirements?

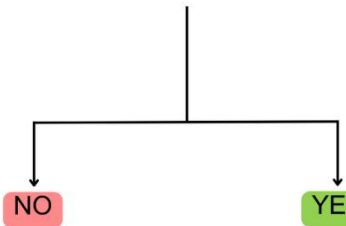
### 1. Is it a natural substance? (Section 3.1)

- Non-GMO (produced neither from nor by GMOs) (Section 2.3)
- Not restricted by CITES, Appendix I (Section 3.1)
- Not subject to ionizing radiation (Section 5.3)

✓ **ORIGIN**  
Botanic, inorganic-mineral or animal and their mixtures.

✓ **MANUFACTURE [permitted]**

1. **Only** physical process including extraction with the extraction and purifying agents listed in Annex 1a and pH adjusting agents listed in Annex 1b.
2. Enzymatic and microbiological methods if **only** naturally occurring enzymes or micro-organisms are used, and, the end products are identical to those which occur in nature.



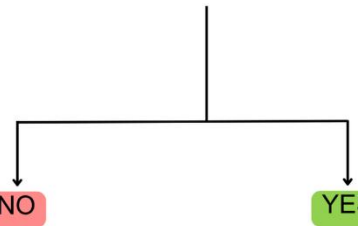
**NO**  
It is not permitted as a natural fragrance for NATRUE certified products

### 2. Correspond with ISO 9235? (Section 2.4)

**2.19 Natural raw material\***  
*Natural raw material of vegetal, animal or microbiological origin*

*Conformity certificate with ISO 9235 required*

\* NATRUE compliance requirements for extraction and enzymatic/microbiological production methods used have to be met.

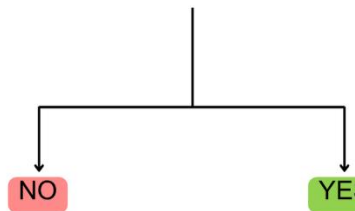


**NO**  
It is not permitted as a natural fragrance for NATRUE certified products

### 3. Are the auxiliary materials (extraction agents, solvents, residual solvent levels) in accordance with NATRUE criteria?

**If** non-natural/derived natural solvents or other auxiliaries are used due to no other option being offered by the latest technology, these must be completely removed after processing.

For all such substances the residual solvent level must be indicated (e.g. for concretes or the resulting flower absolues and waxes) in the RMDF (**R**aw **M**aterial **D**ocumentation **F**ile)



**NO**  
It is not permitted as a natural fragrance for NATRUE certified products

**YES**  
**NATRUE compliant fragrance**

To facilitate the NAC's assessment of fragrances, the supplier can choose to provide information by completing the RMDF for perfumes found [here](#) or the Self-declaration form found [here](#).

### B.2.9. 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>10</sup>:

- Guar Hydroxytrimonium Chloride
- Cocamidopropyl betaine
- Carboxymethyl cellulose

### B.2.10. (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.

### B.2.11. 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.

### B.2.12. Solvent Inventory (natural substance extraction or purification)

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
Cannabidiol, Cannabigerol <sup>11</sup>	Acetone, heptane, pentane	< 0.5%	Purification, winterization
Carrageenan	Isopropanol	0,5% in the final RM (where carrageenan is ~10%)	Purification (Precipitation)
Carthamus Tinctorius Seed Oil	Hexane	< 1 ppm	Extraction

<sup>10</sup> Synthetic moieties are reported in red and natural moiety are in green.

<sup>11</sup> only for this INCI, and not the INCI: 'Cannabis Sativa Leaf Extract'.

Chlorophyll (oil-soluble) <sup>12</sup>	Synthetic solvents (excluding halogenated ones)	Levels complying with the ICH Guideline for residual solvents	Extraction
Lecithin	Hexane	information pending	Extraction
Mangifera Indica Seed Butter	Hexane	< 1 ppm	Extraction
Olea Europaea Seed Powder	Hexane	< 1 ppm	Extraction
Olea Europaea Kernel Meal	Hexane	< 1 ppm	Extraction
Oryza Sativa Bran Oil	Hexane	< 1 ppm	Extraction
Oryza Sativa Bran Wax	Hexane	< 1 ppm	Extraction
Pectin	Isopropanol	0,5% in the final RM (where pectin is ~60%)	Purification (Precipitation)
Shorea Robusta Seed Butter	Hexane	< 1 ppm	Extraction
Helianthus Annuus Seed Wax	Hexane	< 1 ppm	Extraction
	Isopropanol/Isopropyl alcohol/2-propanol	< 1 ppm	Extraction
Tamarindus Indica Seed Gum	Isopropanol/Isopropyl alcohol/2-propanol	< 100 ppm	Extraction
Tocopherol	Hexane	< 1 ppm	Extraction
Triticum Vulgare Germ Oil	Hexane	< 1 ppm	Extraction
Ubiquinone (coenzyme Q10)	Ethyl Acetate	< 0.005%	Extraction/Purification
	Hexane	< 1 ppm	Extraction/Purification
Unsaponifiables	Hexane	< 1 ppm	Extraction
Vitis Vinifera Seed Oil	Hexane	< 1 ppm	Extraction

### B.2.13. 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.

### B.2.14. 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 %

<sup>12</sup> only for this INCI, and not the INCI: 'Chlorophyllin'.



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%)

## C. FINISHED PRODUCTS AND FORMULAS

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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](#)

### C.1. Product Category Evaluation

All products are certified based upon their compliance with the latest version of the NATRUE Standard.

Finished product formulations are categorised in the NATRUE Standard according to primary function, which is more important for categorisation than the formulation, according to the following list of 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

For the formulation requirements, Table 1 in the NATRUE Standard provides the corresponding minimum levels of natural substances and maximum levels of derived natural substances for each category and for each certification level respectively.

If one product can fit in two or more categories, 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.

The NATRUE Approved Certifier will allocate the final category and certification level.

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

- Category 1<sup>13</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.
- Category 7: sunscreens; skincare and makeup products with SPF.  
If skincare products (cat. 3 and 6) or makeup products containing water (cat. 4) have a SPF declared on the product label, they can be classified also under cat. 7 ("Sunscreens"). To this end, any SPF is eligible (e.g., from SPF 2 to SPF 50+).  
Makeup products water-free (cat. 11) having a SPF declared on the product label can remain under cat. 11.
- 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, face tonic, hydrating body spray.

### Cosmetic Kits

For Cosmetic Kits (*cf.* as described in Section 3.5.6 of the European Commission's [Borderline Products Manual](#)) 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 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 SC.

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<sup>13</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.

## C.2. How to calculate the certification level

Step 1: Evaluate the product category by function and identify the formulation conditions for the category found in Table 1 of the NATRUE standard.

Step 2: Calculate the formulation requirements by category and content:

- Natural content, Derived Natural content.

Step 3: Calculate the organic content using the following formula:

$$\% \text{ Organic Content} = \frac{(\text{Organic Natural} + \text{Calculated Organic Derived Natural})}{(\text{Total Natural} + \text{Derived Natural from organic})}$$

Step 4: Evaluate formulation conformity and assign certification level.

### Example 1: Oils/water-free cleaning and skin care product (e.g. Body oil)

INCI ( * : organic starting material )	%	Ingredient classification / portion (%)						nature- identical	water / inorganic salts
		natural		derived natural					
		total	organic	total	from organic	calculated organic (cf. Annex 5)			
Helianthus Annuus Seed Oil	58	58							
Olea Europaea Fruit Oil	25	25							
Butyrospermum Parkii Butter*	5	5	5						
Tocopherol	1	1							
Parfum (100% essential oils)* (33.3% organic)	1,5	1,5	0,5						
Polyglyceryl-3 Palmitate	4,5			4,5					
Glyceryl Caprylate	5			5					
<b>TOTAL</b>	<b>100</b>	<b>90,5</b>	<b>5,5</b>	<b>9,5</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	

$$\% \text{ Organic Content} = \frac{(\text{Org. Nat} + \text{Calc. Org. Der. Nat})}{(\text{Tot. Nat} + \text{Der. Nat. from Org})} * 100 = \frac{(5.5 + 0)}{(90.5 + 0)} * 100 = 6.1\%$$

Calculation of the Certification level for Example 1:

Step 1: What category does it belong to? (re: Table 1)

- ✓ Category 1: Oils/water-free cleaning and skin care product

Step 2: Calculate the natural and derived natural content:

Level 1: Natural Cosmetics

- ✓ Min 80% natural content required → 90.5% achieved
- ✓ Max 20% derived natural content → 9.5% achieved

Level 2: Organic Cosmetics

- ✓ Min 90% natural content required → 90.5% achieved
- ✓ Max 10% derived natural content → 9.5% achieved

Step 3: if Level 2 is also achieved, calculate the organic content:

- Min 95 % → 6.1% not achieved

Step 4: Assign certification level

→ **NATURAL COSMETIC**

### Example 2: Emulsion O/W (e.g. hand cream)

INCI (* : organic starting material)	%	Ingredient classification / portion (%)						
		natural		derived natural			nature-identical	water / inorganic salts
		total	organic	total	from organic	calculated organic (cf. Annex 5)		
Butyrospermum Parkii Butter*	12	12	12					
Prunus Armeniaca Kernel Oil*	8	8	8					
Parfum (100% essential oils)	0,5	0,5						
Alcohol (90%)*	5	4,5	4,5					0,5
Xanthan Gum	1	1						
Glyceryl Caprylate	2,5			2,5				
Emulsifier (listed in Annex 3 and compliant)	4			4				
Glycerin*	4			4	4	3,92		
Sodium Benzoate	0,4						0,4	
Aloe Barbadensis Leaf Juice*	9	9	9					
Aqua	53,6							53,6
<b>TOTAL</b>	<b>100</b>	<b>35</b>	<b>33,5</b>	<b>10,5</b>	<b>4</b>	<b>3,92</b>	<b>0,4</b>	<b>54,1</b>

$$\% \text{ Organic Content} = \frac{(\text{Org. Nat} + \text{Calc. Org. Der. Nat})}{(\text{Tot. Nat} + \text{Der. Nat. from Org})} * 100 = \frac{(33.5+3.92)}{(35+4)} * 100 = 95.95\%$$

### Calculation of the Certification level for Example 2:

Step 1: What category does it belong to? (re: Table 1)

✓ Category 6: Skin care emulsions (O/W) and gels

Step 2: Calculate the natural and derived natural content:

Level 1: Natural Cosmetics

- ✓ Min 10% natural content required → 35% achieved
- ✓ Max 25% derived natural content → 10.5% achieved

Level 2: Organic Cosmetics

- ✓ Min 15% natural content required → 35% achieved
- ✓ Max 20% derived natural content → 10.5% achieved

Step 3: if Level 2 is also achieved, calculate the organic content:

- Min 95 % → 95.95% achieved

Step 4: Assign certification level

→ **ORGANIC COSMETICS**

### Example 3: Emulsion O/W (e.g. hand cream)

Formula

INCI (* : organic starting material)	%	Ingredient classification / portion (%)						nature- identical	water / inorganic salts
		natural		derived natural					
		total	organic	total	from organic	calculated organic (cf. Annex 5)			
Butyrospermum Parkii Butter*	2,5	2,5	2,5						
Prunus Armeniaca Kernel Oil*	2	2	2						
Parfum (100% essential oils)	1	1							
Alcohol (90%)	3,0	2,7						0,3	
Xanthan Gum	1	1							
Glyceryl Caprylate	2,5			2,5					
Emulsifier (listed in Annex 3 and compliant)	4			4					
Glycerin*	4			4	4	3,92			
Sodium Benzoate	0,4						0,4		
Aqua	79,6							79,6	
<b>TOTAL</b>	<b>100</b>	<b>9,2</b>	<b>4,5</b>	<b>10,5</b>	<b>4</b>	<b>3,92</b>	<b>0,4</b>	<b>79,9</b>	

$$\% \text{ Organic Content} = \frac{(\text{Org. Nat} + \text{Calc. Org. Der. Nat})}{(\text{Tot. Nat} + \text{Der. Nat. from Org.})} * 100 = \frac{(4,5 + 3,92)}{(9,2 + 4)} * 100 = 63,79\%$$

### Calculation of the Certification level for Example 3:

Step 1: What category does it belong to? (re: Table 1)

- ✓ Category 6: Skin care emulsions (O/W) and gels

Step 2: Calculate the natural and derived natural content:

Level 1: Natural Cosmetics

- ✓ Min 10% natural content required → 9.2% not achieved
- ✓ Max 25% derived natural content → 10.5% achieved

Level 2: Organic Cosmetics

- ✓ Min 15% natural content required → 9.2% not achieved
- ✓ Max 20% derived natural content → 10.5% achieved

Step 3: if Level 2 is also achieved, calculate the organic content:

- Min 95 % → 63.79% not achieved

Step 4: Assign certification level:

**THIS PRODUCT FORMULATION CANNOT BE CERTIFIED**

- **REFORMULATION REQUIRED → Raise natural substances**

### C.2.1 Tool for calculation of Finished Products certification level

An excel file called '*Calculation sheet for Finished Products certification level*' available [here](#), may support for calculation of the certification level of finished products.

## C.3. 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.

## D. FORMULAS

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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.

## E. NATRUE DATABASE

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### E.1. NATRUE Database for raw materials

All NATRUE approved or certified raw materials are listed in [NATRUE's public database](#). 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.

#### E.1.1. Database Representation

Each raw material is listed in the database by its:

- name (raw material trade name)
- manufacturer
- composition (according to NATRUE<sup>14</sup>)
- 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.

#### 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

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<sup>14</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.



Case (b) - **wrong** representation on the database:

12% Natural (**12% Organic**)

45% Derived natural (**44,1% Organic**)

0,5% Nature-identical

42,5% Water