

NCS

NATURAL COSMETICS STANDARD



**Natural cosmetics for humans,
animals and the environment**

Developed by GfaW Gesellschaft für angewandte Wirtschaftsethik (Society of Applied Ethics in Business) in cooperation with EcoControl GmbH and INCI-Experts GmbH.

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Introduction

The Natural Cosmetics Standard NCS regulates the requirements of certified natural cosmetics. "Natural cosmetics" are conceived of as cosmetic products, the ingredients of which are untreated and/or arise from natural raw materials. In case of a successful certification of the declared products, the NCS label can be used for marketing purposes.

The NCS Standard regulates the quality of a product's ingredients but not the composition of the product itself. Certification is not bound to the membership of any institution and is therefore an option for manufacturers who do not want to be associated with any organisation and simply wish to have their organic ingredients certified.

The NCS Standard serves as a basis for the design of customised natural cosmetic products. It assures the quality of ingredients according to the generally valid definition of natural cosmetics. Furthermore, it simplifies access for the first-time manufacturer of natural cosmetics.

Requirements that are already covered through Cosmetics Regulation, waste disposal regulations, labour law, etc. are not part of this standard.

The NCS is composed of the criteria and an annex. The annex consists of a white-list which complements the criteria. It is a white-list which can be expanded upon request.

The NCS label for marking products also provides customers with sound guidance. Manufacturers using the NCS trademark can also list those ingredients which are certified as being of organic quality.

Scope of application

The NCS refers to all cosmetic products intended for humans and animals. In this context, cosmetic products are defined as substances or mixtures that are intended to come into external contact with parts of the human body or with teeth and oral mucosa, for the sole purpose of cleaning them, perfuming them, changing their appearance, protecting them, keeping them in good condition or having an impact on body odours.

Assortment requirements

If the manufacturer offers cosmetic products which are not in compliance with the natural cosmetics directive, these products must be clearly differentiated through appropriate marking or other aspects of appearance. The NCS Standard may only be applied for if at least 60% of the product assortment (with reference to the total number of products in the assortment) are natural products. All necessary testing records of the natural cosmetics assortment must therefore be provided, irrespective of the number of natural products to be certified.

In the case of using several natural cosmetic standards at least 60% of all products have to be registered as NCS and labelled with NCS.

General Criteria

NCS certified products are composed **solely** of raw materials named in the NCS Standard and produced only through processes named in the NCS standard. The Annex contains a white-list of modified raw materials and nature-identical inorganic pigments and minerals. The qualities of raw materials are described in the criteria.

Surfactants must be biodegradable by more than 60% within 28 days according to OECD Test 310 (EN ISO 14593) and 311 (EN ISO 11734).

Animal-testing for the purposes of the production or distribution of NCS certified products is forbidden.

With regard to GMO freedom, the requirements of the EC Organic Regulation (Regulation (EC) No. 834/2007, until 31.12.2008, Regulation (EEC) No. 2092/91) apply to the end product and the raw materials used. This requirement also applies to ingredients that would not be covered by the Organic VO, such as non-food substances and non-organic certified material.¹

¹ The substances are neither produced from nor produced by nor with the help of genetically modified organisms. Evidence for plants is the PCR method (the threshold of a random, technically unavoidable admixture is 0.9%) and for the other substances a GMO declaration of freedom of the manufacturer. Selected raw materials which cannot be produced without enzymes from genetically modified organisms according to the current state of the art and which are marked separately in

1. Definition of permitted raw material groups

Cosmetic ingredients permitted by NCS are classified into the following raw material groups:

- **Natural raw material:** chemical unmodified raw material of vegetable, inorganic-mineral or animal origin as well as their mixtures and reaction-products with each other.
- **Modified raw material:** Raw material obtained from natural material as defined above through permitted chemical reactions.
- **Nature-identical inorganic pigments and minerals:** Raw material, the chemical composition of which is identical to natural pigments and minerals.
- **Nature-identical preservatives:** Raw material, the chemical composition of which is identical to natural substances and which is used as a preservative.

2. Raw Materials and their Processes

For production of NCS certified products the following raw materials and processes are permitted:

2.1 Natural Raw Material

Natural raw materials are obtained only through physical processes using extraction and auxiliary agents listed in point 2.5. All natural materials are preferably derived from certified organic raw material (kbA or kbT).

Furthermore enzymatic and microbiological methods are permitted as long as naturally occurring enzymes and micro-organisms are used.

the positive list will be given a tolerance period until the end of 2022. A query on the declaration of freedom will be provided by the standard provider.

Raw materials descend from rare or protected species of animals may only be used when they are taken from live animals which are reared in a cruelty-free way which is appropriate to their species. Raw materials of vegetable origin from protected or rare species of plants may only be used when they have been grown organically and in a way which is appropriate to the species. Critical substances in terms of sustainability such as palm oil should be avoided. If the use of palm oil or palm kernel oil cannot be avoided, it must at least be of RSPO-certified origin. The standard owner recommends that producers request information from suppliers about relevant aspects related to the sustainability and origins of all raw materials used in their products.

2.1.1 Plant-based Natural Raw Material

The following Raw Material originate from certified organic agriculture:

Sunfloweroil, oliveoil, soyoil, coconutoil, jojobaoil.² Sheabutter originates either from Organic agriculture or from wild-harvest.

The use of chemically unmodified vegetable raw materials (essential oils, fatty oils in extracts etc.) is basically permitted. Plants are not subject to the approval process for the white-list and need not be listed in it. The EC Cosmetics Regulation, in particular for the protection of human health, must be taken into account. It is the manufacturer's responsibility to use only harmless raw materials.

Raw materials gained from fermentation or biotechnological processes are also permitted in so far as they exclusively occur in nature. They are not subject to the approval process for the white-list, nor need they be listed in it.

² If the feedstock is temporarily unavailable in organic quality due to crop failure or political conditions (trade boycott or similar) or due to geographical reason – emerging countries, this unavailability is evidenced by documented demand from at least three different traders. **If the raw material is not available in organic quality due to civil war in the country of production, the conventional quality from this country is preferred to the organic quality from another country. This serves the economic support of the country. Only when a safe control in this country can take place again, the organic quality should be used.**

2.1.2 Animal Natural Raw Material

The use of raw materials produced by animals (e.g. milk, honey) is permitted. The use of raw materials derived from dead vertebrates (e.g. emu oil, mink oil, marmot oil, animal fats, collagen and living cells) is not allowed.

2.1.3 Mineral Natural Raw Material

Natural raw material of mineral origin is permitted as long as it is chemically unmodified and was obtained through physical processes. Mineral salts such as magnesium sulphate or sodium chloride are allowed in NCS certified products. Exceptions can be found under point 3, "Non-permitted Raw Material".

2.1.4 Fragrances

Natural fragrances which comply with ISO Standard 9235 are permitted. Furthermore, fragrances produced through biotechnology can also be used.

Fragrances are not included in the white-list and do not have to be registered. A declaration of ISO 9235 compliance by the manufacturer is sufficient.

2.1.5 Water

Water is classified as a natural raw material as long as it originates from plants. As long as the origin is proven to be organically certified, it can be declared as such.

2.2 Modified Raw Material

Modified raw material may be obtained from natural raw materials as defined above by using following chemical reactions: hydrolysis (including saponification), neutralisation, condensation with elimination of water, esterification, transesterification, hydrogenation, hydrogenolysis, dehydrogenation, glycosidation, phosphorylation, sulphatation, acylation, amidation, dimerization, oxidation (with oxygen, ozone and peroxides) and pyrolysis.

The application of Halogenated Organic Compounds for the modification of natural raw materials is not allowed.

2.3 Nature-identical Minerals and Pigments

Permitted nature-identical minerals, preservatives, pigments and vitamin are listed in the white-list. (Annex white list)

2.4 Nature-identical Preservatives

If necessary for the general product safety, the following nature-identical preservatives are permitted in NCS certified products:

- benzoic acid and its salts
 - salicylic acid and its salts
 - sorbic acid and its salts
 - benzyl alcohol
- formic acid and its sodium salts
- dehydroacetic acid and its sodium salts*
- propionic acid and its sodium salts

When these preservatives are used, the additional phrase "preserved using ... [Name of the preservative]" on the packaging is required.

* As far as in accordance with directive 76/768/EWG, excluded from this are ethanolamine salts.

2.5 Auxiliary and Extraction Agents

Permitted extraction agents for natural materials are: water, ethanol of plant origin, carbon dioxide, fats and oil of plant origin, glycerine of plant origin. Beyond that, naturally occurring enzymatic and microbiological processes are allowed. If there is no alternative extract, extraction agents not complying with the NCS Standard are allowed. In such cases, the

extraction agent must be reduced down to the limit of detection which is listed in the analytical method according to § 5e of EC Cosmetics Regulation.

Pretreatment with preservatives and processing aids must meet the requirements of the directive if they remain in the final product. The only exception is made for auxiliary agents which are used and then removed as far as state of the art technology allows (for example solvents).

All raw materials and processing aids (especially preservatives and processing aids) which are in the final product must be registered with their INCI title. This requirement applies irrespective of whether or not they legally constitute "ingredients" according to § 1 of the EC Cosmetic Regulation. When reporting the composition, sentence 2 of §1 of the EC Cosmetic Regulation does not apply.

2.6 Aerosol

Aerosol gases are ingredients of the product. NCS certified products may contain CO², nitrogen and compressed air.

3. Non-permitted Raw Material

The following material groups are not permitted in NCS certified products:

- EDTA complexing agents, glutaraldehyde, formaldehyde or formaldehyde releaser
- Halogenic organic compounds
- Synthetic fats, oil, waxes or silicones
- Aromatic amines, ethanolamin and –derivates
- Synthetic fragrances
- Ethoxylated raw materials
- Artificial musk compounds
- Phtalates
- PEG and PEG-Derivates
- Solid, insoluble polymers, especially if they are smaller than 5 mm

4 Nanomaterial

Ingredients that must be labelled as "nanomaterials" under the EU Cosmetics Regulation are not permitted in NCS-certified products. Excluded from this are substances that are coated. In this case, the material for coating must comply with this standard.^{3, 4}

5 Radioactive Radiation

The treatment of vegetable and animal raw materials and the end products with ionising rays is not permitted.

6 Packaging

NCS-certified products are only placed on the market in environmentally friendly packaging. This can be reusable packaging or disposable packaging made of recyclable material, such as glass, PET and PP plastic, cardboard, paper or metal, but not halogenated plastics such as chlorinated plastics. Refill packaging and systems for refilling must be offered to retailers or co-op initiatives as required in order to minimise packaging.

³ This applies to all formulations and products registered for certification after 01.08.2020. Products registered before 01.08.2020 are subject to a transition period until 31.12.2023 to adapt the formula to non-nano or coated raw materials.

⁴ The current state of science does not allow any clear conclusion to be drawn about the risk or harmlessness of nanomaterials. (see <https://www.umweltbundesamt.de/publikationen/nanomaterialien-in-der-umwelt>) Studies have so far only been conducted with non-coated particles. The coating prevents oxidation of the particles and thus increases the chance of better tolerability. Until further findings are available, the standard setter sees this criterion as a compromise.

The design of the packaging enables the product to be emptied completely.

7 Requirements for Labelling

NCS certified products may be labelled as “certified natural cosmetics” and are allowed to bear the NCS mark.

The following labelling options are feasible:

1. A product certified by the NCS Standard may be labelled as an “organic cosmetic” if at least 95% of the ingredients originate from certified organic cultivation. In this case the percentage of organically cultivated ingredients must be calculated based on the total ingredients (for example 45% of the total ingredients are organically certified). Organic cosmetic products may bear the label “organic quality”.
2. An NCS-certified product may be labelled as a vegan natural cosmetics if no ingredients are of animal origin or is obtained from animal substances.

The ingredients of all NCS certified products must be declared on the packaging via the INCI register.

If ingredients of certified organic quality are included in the product, they may be characterised as follows:

Details concerning the organic quality of ingredients are only reliable if they are listed in such a way that they can be unmistakably and precisely traced in the list of ingredients. Use of the phrase “organic quality” refers to the certified organic origin of the primary material. For example, the precise declaration with “*” can be used. This arrangement applies accordingly to all synonyms such as “bio”, “organic” or “eco”. The language is irrelevant.

1. The proportion of organic quality ingredients is specified by its percentage and should be declared in whole numbers. Fractional numbers are rounded up to the next whole number.

Permitted declarations, for example, are: "100% of those ingredients which can be organic are organic", or "product contains 70% organic ingredients".

- When calculating the percentage regarding point **5.2**, the following needs to be considered:

Ingredients of organic quality are measured in terms of their whole weight proportion, e.g. parts of plants, pressed juices, pressed oils and essential oils.

Plant extracts can be measured in their whole weight proportion if the final product does not include extraction agents (e.g. CO₂ extraction) or the remaining extraction agent itself has organic quality.

Following formula may be used:

$$X = P/(P+E) \times 100$$

X = organic amount in extract

P = mass of used plant raw material

E = mass of used extraction agent

- For concentrates, the weight of the primary material does not need to be calculated. The water added to the concentrate does not need to be considered.

8 Supplier Changes

Any changes in raw material supplier do not have to be communicated to the standard owner as long as the respective raw material is not subject to any restrictions.

In cases where the raw material is subject to restrictions, the manufacturer is required to prove compliance with these restrictions in the course of the next audit.

The standard owner recommends that the producer requests information about sustainability and human rights from their suppliers. If desired, the standard owner can provide templates for this purpose.