

NCP

NATURE CARE PRODUCTS

STANDARD



**Innovative product standard for
ecological non-food products**

A Standard of the Society for Applied Business Ethics (Gfaw Gesellschaft für angewandte Wirtschaftsethik mbH)

Developed in cooperation with

EcoControl GmbH, INCI Experts GmbH, Ingenierbüro E.C. Schweig mbH and the working-group "ecological raw material"

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Introduction

Since the EU Regulation on Organic Agriculture applies only to food and unprocessed agricultural products, the organic non-food sector needs further regulation. There are numerous standards for natural cosmetics for other organic non-food products however do not exist. The aim of the Nature Care Products Standard (NCP standard) is to close the gap of regulation and give a criteria base for the entire ecological and organic non-food area.

The NCP regulates the requirements for certified care products as well any non-food product based on natural raw materials. Care products are defined as any product used to clean, preserve or protect common utensils, plants, textiles or food. The NCP standard particularly includes detergents and cleaning agents, textile and leather care products, pesticides and fertilizers. Such care products will always have some impact on the environment, whether through their manufacture, use, or disposal. The NCP standard sets minimum requirements for the ingredients and manufacturing processes of care products and so insure a natural product that works harmony with nature. It is based on the requirements of the EU Regulation on Organic Agriculture number 834/2007 and 889/2008.

The positive list compliments the NCP standard. This list includes all authorized substances and correlates in the field of biocides to the current Annex II of the Implementing Rules for regulation 889/2008. It sees itself as an open list and can be extended upon request by compliant raw materials.

The NCP label acts as an important guide for consumers to indicate certified natural care product in compliance with the standard.¹

Building on this product certification, the standard setter recommends the CSE Certified Sustainable Economics <https://gfaw.eu/> certification and the climate accounting tool for the ba-

¹ Unfortunately, the current version of the Biocidal Regulation does not allow biocidal products to be labeled with "natural", "environmentally friendly", "harmless" or similar. For this reason, unfortunately, the standard owner advises not to use the NCP sign for biocides that fall under the biocidal regulations. It is advisable to clarify by means of a legal consulting whether an NCP certification may be indicated in the product descriptions or whether the indication "is approved for organic farming according to the EU Eco-Regulation" complies with the Biocidal Regulation.

sis of a corporate carbon footprint (<https://gfaw.eu/ergaenzende-nachhaltigkeitsleistungen/>).

Definition

Composite packaging: Packaging consisting of different types of material that cannot be separated manually, none of which exceeds 95% of the total packaging by mass.

Biocides are: "any substance or mixture, in the form in which it is supplied to the user, consisting of, containing or generating one or more active substances, with the intention of destroying, deterring, rendering harmless, preventing the action of, or otherwise exerting a controlling effect on, any harmful organism by any means other than mere physical or mechanical action" (Article 3, 1 (a) EU-Regulation Nr. 528/2012)

And

"any substance or mixture, generated from substances or mixtures which do not themselves fall under the first indent, to be used with the intention of destroying, deterring, rendering harmless, preventing the action of, or otherwise exerting a controlling effect on, any harmful organism by any means other than mere physical or mechanical action." (Article 3, 1 (a) EU-Regulation 528/2012)

Foreign materials: Material composition other than the basic packaging - e.g. sleeves or labels.

Impurities: Substances that interfere with or prevent the recycling process according to the current state of the art.

Natural: is in this standard all substances based on not-fossil plants, on animals or fungi.

NIR: Near Infrared. NIR (near infrared) refers to a spectrum in a range between 760 and 2,500 nm that is not visible to humans. In this wavelength range, material-typical patterns based on molecular vibrations can be detected after excitation with light. This technology is used for sorting packaging.

Recyclability: Recyclability is the individual gradual suitability of a package or product to be recycled in the post-consumer phase. product to actually substitute material-identical new goods in the after-use phase; "actually" here means material-identical virgin material in the after-use phase; "actual" here means that collection and industrial scale are a prerequisite.

Recycling share: Share of recycled raw materials in relation to the total of raw materials.

Synthetic: is in this standard all substances based on chemical processes which do not exist in nature or on petrochemical origin.

1. The NPC standard's range of application

The NCP standard refers to all products that can be made from renewable raw materials. It is based on the requirements of the EU Organic Regulation 2018/848 and the annexes of the implementing regulation 889/2008 of the former EU Organic Regulation.

The standard is particularly designed for detergents and cleaning agents, leather and textile care products, toys, sanitary products, pesticides, repellents for vertebrates and mollusks, insecticides, disinfectants, fungicides, acaricides, and fertilizers. Products used to clean, protect, or care for humans or animals are regulated by the NCS Natural Cosmetic Standard (www.natural-cosmetic.cc).

Upon the successful certification of the registered products, the label "NCP Nature Care Product" may be used for marketing purposes. In addition to the use of the label, the user may also advertize the ingredients in the product as organic. The user may also advertize the whole product as organic if at least 95% of the agricultural ingredients are certified organic. In this case, the proportions of the organic ingredients, expressed in percentages, must be indicated.

Compliance with the statutory provisions, in particular with regard to regulation (EC) 648/2004 (detergents) and its revisions, particularly in relation to the environmental compatibility of washing and cleaning agents, regulation (EC) 528/2012 (biocide)²,

² Unfortunately, the current version of the Biocidal Regulation does not allow biocidal products to be labeled with "natural", "environmentally friendly", "harmless" or similar. For this reason, unfortunately, the standard owner advises not to use the NCP sign for biocides that fall under the biocidal regulations. It is advisable to clarify by means of a legal consulting whether an NCP certification may be indicated in the product descriptions or whether the indication "is approved for organic farming according to the EU Eco-Regulation" compies with the Biocidal Regulation

regulation (EC) 1272/2008 (CLP) and regulation (EC) 1907/2006 (REACH), regulation on fertilizers (DüMV), and the Plant Protection Act (Pflanzenschutzgesetz) is a prerequisite to receiving the NCP standard label. The requirements for the NCP standard go beyond these regulations.

2. General Criteria

Only the raw materials, production processes, extraction agents and catalyzers defined in the NCP standard may be used to produce NCP certified products. The appendix contains a positive list of all tolerated raw materials for biocides and plant protection agents. It consists of the Annex II of the Implementing Rules for the EU Regulation on Organic Agriculture number 889/2008 and a few additional raw materials which are necessary as a carrier for active ingredients. If a material does not meet the criteria listed here, but is essential for the effectiveness of a product that would otherwise meet the NCP criteria, a request may be made for its inclusion in the criteria. The decision on its inclusion in the standard is based on the requirements set forth in the EU Regulation on Organic Agriculture **2018/848 and the annexes of the implementing regulation 889/2008 of the former EU Organic Regulation**. Additionally, a justification of the materials inclusion and a statement attesting the irreplaceability of the raw material must be made.

NCP-certified products shall not contain SVHC substances (Substances of Very High Concern)³ or CMR substances, in accordance with Regulation (EC) 1272/2008 (CLP), except for the fragrances (according to ISO 9235). However, the final product may not be classified in the H400 series, according to Regulation (EC) No 1272/2008 (CLP) on the classification, labeling and packaging of substances and mixtures, with the exception of products whose natural essential oils (fragrances according to ISO 9235) result in H400-classification.

³ As part of compliance with the REACH Regulation, SVHC substances must be labeled as such.

If no safety analysis and/or efficacy study for the active ingredients of biocides exists, at least one risk assessment analysis must have been carried out in accordance with the "Guidelines for Health Assessments" from the German Federal Institute for Risk Assessment (Bundesinstitut für Risikobewertung).

Testing on animals is not allowed in connection with the manufacture and distribution of NCP-certified products, with the exception of efficacy studies for raw materials used for biocides. Testing on animals in order to determine the LD50 values for vertebrates and/or the aquatic toxicity for raw materials is not allowed. Data on similar substances may be used to calculate an analogy or data may be determined through in-vitro-experiments.

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.⁴

⁴ The substances are neither produced from nor by nor with the aid of genetically modified organisms. Proof is a GMO-free declaration by the manufacturer and, in case of doubt, a PCR analysis (the threshold value of an adventitious, technically unavoidable admixture is 0.9. Selected raw materials which, according to the current state of the art, cannot be produced without enzymes from genetically modified organisms and which are marked separately in the positive list are granted a tolerance period until the end of 2023. A query on the declaration of freedom is provided by the standard setter.

3. Definition of Approved Groups of Materials

The ingredients for care products that meet the NCP standards are divided into the following groups:

- **Natural Materials:** raw materials of vegetable, inorganic-mineral or animal origin which have not been chemically modified, as well as mixtures or the products of a reaction of these materials with each other.
- **Derived Natural Materials:** raw materials derived from a natural substance in accordance with the definition provided above **or biomass or organic solid materials** through approved chemical reactions.
- **Nature-identical Material:** substances which appear in nature but can't be gained by the allowed chemical processes.
- **Materials used for biocides, substances for the monitoring of pest, and repellents:** substances which are used to kill, deter, or attract pests.

4. Raw Materials and their Production Processes

The following raw materials and production methods may be used for NCP-certified products:

4.1 Natural Materials

Only physical methods, with the use of the extraction agents and catalyzers listed in section 4.2.2, may be used for the extraction of natural materials. Additionally, enzymatic and microbiological methods are only permitted if they exclusively use enzymes or microorganisms that also occur in nature.

4.1.1 Natural Materials of Vegetable or Animal Origin

Plant and animal natural substances originate from the following origin materials have to be certified organic:

Sunflowers, olives, soy, coconut, jojoba. Shea butter comes either from organic source material or from wild collection.

All other natural materials are preferably derived from certified organic raw material (kbA or kbT).⁵

The use of all chemically unmodified natural plant substances (essential oils, fatty oils, extracts, etc.) is generally permitted if the substance was obtained according to the principles of the standard.

Animal raw materials used as a fertilizer or as a protective agent should be drawn either from excrements or from by-products of the slaughtering process. Raw materials coming from endangered species may not be used, unless the material comes from alive animals in a way that is in line with the conservation of the specie.

Unavoidable raw materials based on palm oil or palm-kernet-oil derive from sustainable cultivation, at least RSPO-origin.

4.1.2 Mineral Natural Materials

Mineral natural materials are generally permitted, provided they were obtained by physical methods and not chemically altered. Mineral salts such as magnesium sulfate or sodium chloride may be used in NCP-certified products. Exceptions are listed under section 3 "Prohibited Materials."

4.1.3 Fragrances

Fragrances that correspond to the ISO standard 9235, as well as biotechnology-derived fragrances, may be used in NCP-certified products. The certificate of compliance with ISO 9235 is sufficient for a certification under the NCP-standard.

4.1.4 Water

Water is a natural substance. Water can only be classified as a natural substance

⁵If 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.

arised from agriculture, if it comes directly from a plant source. In this case, it can be designated as such if the original plant material is certified organic.

4.2 Derived Natural Raw Materials

Modified raw materials may be obtained from natural materials, as defined above or biomass or organic solid materials, by fermentation with GMO-free Organismen or by the following chemical reactions: hydrolysis (including saponification), neutralization, condensation by the elimination of water, esterification, transesterification, hydrogenation, hydrogenolysis, dehydrogenation, glycosylation, phosphorylation, sulfation, amidation, oxidation (with oxygen, ozone or peroxides) and pyrolysis. The use of organic halogen compounds for the production of modified raw materials is not permitted.

Electrolysis is permitted as a possible processing step. However, no substance from chapter 5 "Non-permitted substances" may be produced, with the exception of the substances listed in the EC Eco Regulation Annex VII for disinfectants and cleaning agents. The following applies to these: If a substance from Chapter 5 "Non-permitted substances" is produced, it must not account for more than 0.1% of the total product. See also 4.41.

4.2.1 Surfactants

Surfactants must be derived from raw materials of natural origin. All surfactants must demonstrate a biodegradability of > 60% within 28 days, in accordance with the OECD test 310 (EN ISO 14593, CO₂ headspace test) for aerobic degradation and OECD test 311 (EN ISO 11734) for anaerobic degradation.

Surfactants from coniferous resins are not permitted due to their aquatic toxicity.

4.2.2 Extraction Agents and Catalyzers

The following extraction agents for natural materials are permitted: water, vegetable alcohol, carbonic acid, vegetable fats and oils, and glycerin stemming from plant

material. Furthermore, only enzymatic and microbiological methods that also occur in nature may be used.

Pre-conservation as well as technical and chemical catalyzers, if they remain in the final product, must be used in accordance with **this NCP standard**.

4.2.3 Aerosols

Propellant gases are considered to be components of the final product. NCP-certified products may use the following propellant gases: carbon dioxide, nitrogen, and compressed air.

4.3 Nature-identical Raw Material

The recognized nature-identical raw materials are listed in the white-list. The use of nature-identical raw materials has to be justified.

4.4 Requirements for special products

4.4.1 Materials used for Biocides, Substances for the Monitoring of Pest, and Repellents, as well as Plant Protection Agents

The positive list of biocides and plant protection agents sets forth all tolerated substances based on the EU Regulation on Organic Agriculture 834/2007, without which no biocide, pest monitoring substance, or repellent could be effective or justifiable. It consists of the current Annex II of the Implementing Rules for the EU Regulation on Organic Agriculture number 889/2008 and a few additional raw materials which are necessary as a carrier for active ingredients. All other raw materials found in the finished product must comply with the NCP criteria.

4.4.2 Candles

NCP-certified candles meet all the requirements of the standard. In order not to promote the demand for palm oil, a synthetic wax content of up to 3% is tolerated as

a crystallization accelerator for vegan candles based on rapeseed oil.

4.4.3 Products according to DIN EN 71-7

Products that fall under DIN EN 71 are subject to separate conditions. Therefore products such as "**finished finger paints**" must be preserved with the preservatives listed in the DIN EN 71-7. NCP-certified products that fall under DIN EN 71-7 may therefore contain the following preservatives or bitter substances up to the specified maximum percentages:

Phenoxyethanol: 1%

Potassium sorbate: 0.5%

Sodium benzoate: 0.5%

Bitter Denatonium Benzoate: 4ppm

Furthermore, the raw materials listed in the positive list may be used as pigment constituents with a time limit for this product category.

For products from the field of **letterpress printing** (at least 80% of the product consists of paper), the following applies: The paper is FSC, PEFC or recycled paper or board. If individual components of the products cannot be manufactured using the permitted chemical processes from Chapter 4.2, e.g. inks, varnishes, individual additional components such as screws or rubber, these at least meet food law requirements according to Regulation (EC) No. 1935/2004, are free of mineral oils, do not contain any substances from Chapter 5, no SVHC substances, no CMR substances and have not been classified in an H400 series (see also Chapter 2 General criteria). The entire product follows the principle "reduce, reuse, recycle".

5. Prohibited Materials

Materials from the following groups may not be used for NCP-certified products:

- Materials of petrochemical origin, with the exceptions listed in the white list.
- Poorly biodegradable organic substances and anaerobically non-degradable organic substances listed in the DID list of the EU Regulations EcoLabel⁶
- Surfactants from coniferous resins
- EDTA-chelating agents, glutaraldehyde, formaldehyde or formaldehyde splitters
- Halogenated organic compounds
- Synthetic fats, oils, waxes or silicones, with the exception of the crystallisation accelerator for candles
- Aromatic amines, ethanolamines and ethanol derivatives
- Synthetic fragrances
- Mercury
- Musk compounds
- Phthalates
- Polyethylene glycol (PEG) and PEG derivatives
- Synthetic surfactants such as alkylbenzolsulphonates
- Quaternary ammonium compounds
- Borium and its derivatives
- Phosphorus and synthetic phosphates
- Mineral acids (H₃PO₄, HCl, H₂SO₄, ...) and their derivatives
- Ethoxylated substances, with exceptions according to 4.4.2

6. Radioactive Radiation and Nano Materials

The treatment of vegetable and animal raw materials or the end product with ionizing radiation is not permitted. Raw materials that are required by the EU cosmetic regulation to indicate the presence of nano materials may not be used in NCP-

⁶ See: http://ec.europa.eu/environment/ecolabel/documents/did_list/didlist_part_a_en.pdf anaerob marked with "N" means NON-degradable, aerobic marked with "P" means POORLY degradable.

certified products.

7. Packaging and Instructions for Use

NCP-certified products are required to use environmentally friendly packaging. This includes reusable packaging or disposable packaging made of recyclable material (at least 70% recycle-able), such as glass, PE and PP plastic, cardboard, paper or metal. If individual packaging with water-soluble film is used, the film is not made of PVA. Refillable packaging as well as a recycling or refill-service designed to minimize packaging should be offered on the market or to cooperation partners – if needed.

All reusable and refillable packaging should be labeled with instructions and information on the effects and safety aspects of the product and an instruction pamphlet with information on the efficient and proper use of the product must be included. This involves the necessary use of water softeners in hard water to minimize the non-degradable lime soap residue.

Valid for all packaging to be purchased from 01.01.2024. ⁷

7 Explanation of the criteria and recommendations for action

Section 21* of the Packaging Act provides for the implementation of financial incentives for the use of recyclable packaging. No recyclability will result in a payment by the distributors, but the use of at least 90% recyclable packaging provides for a reimbursement.

The standard setter therefore recommends, both from a financial and an environmental point of view, not only to adhere to the minimum requirements in this standard, but to follow the recommendations.

Particularly in the case of fibrous materials, it is often assumed that these are naturally recyclable. However, this can already be undermined by the wrong or too thick varnish, by hotmelts in folding boxes or by coatings and finishes. Information on the recyclability of fibrous materials can be found in the standard PTS-RH 021 97. In the case of fibrous materials, the origin should also be checked, since about half of the cellulose comes from Latin America and from eucalyptus monocultures. In order not to support this trend, it is important not only to see the certificate number of the producing company in the FSC supply chain tracking, but also to list the numbers of the incoming raw materials.

The recyclability of composite materials, plastics, glass and metal packaging is confirmed by companies such as HTP-cylcos, Interseroh or Clover. The EU is working to build a circular economy, so it makes sense to use as much recycle, scrap or cullet in packaging as possible. The use of recycle, for example in the fibre sector, also ensures that raw materials come from domestic collections rather than sources from other continents.

**§ 21 Ecological design of the participation fees

(1) Within the framework of the assessment of the participation fees, systems shall be obliged to create incentives in order to in the production of packaging subject to mandatory participation in the system

Natural products in environmentally harmful packaging do not go together.

Especially not if the packaging gives a green impression although it interferes with the recycling process or is even non-recyclable. The standard counters such green-washing packaging with its criteria:

In principle, the use of packaging materials and packaging materials should ensure that the packaging task can be fulfilled with the lowest possible overall impact (economic, social, ecological).

The impact should always be determined across the entire value chain (raw material production, processing, logistics, use, end of life, reprocessing and new raw material use).

Packaging is used according to the following order of priority:

1st priority Avoid: As little as possible. Is the packaging indispensable?

2nd priority Reduce: The packaging that is necessary should use as little material as possible. Can the packaging material be reduced, e.g. through refill possibilities?

3rd priority Reuse: It is better to use reusable packaging than disposable packaging. The EU's 3rd priority is the development and use of reusable systems. This means that before one-way packaging made of recycled material is designed, it should be clarified whether a reusable system, regardless of its design, would not be possible.

4th priority recyclability: Recyclability of packaging and packaging materials, which is required by the EU and in Germany. This is not about the theoretical recyclability of materials, but about the recyclability of a complete packaging material (incl. closure and labels) in the existing material flows. This means that the packaging / packaging materials must be marked in such a way that the consumer assigns them to the correct material flow. Furthermore, packaging materials and packaging must be automatically recognisable and sortable (NIR technology for sorting recyclable materials). In

1. to promote the use of materials and combinations of materials in the production of packaging subject to system participation that can be recycled to the highest possible percentage, taking into account sorting and recovery practices, and
2. to promote the use of recycled materials and renewable raw materials. ..." (Packaging Act of 05.07.2017)

addition, it must be possible to process them in the existing material flows and to convert them back to raw material / packaging material to an economic degree.

5. emptiability priority: residual emptiability of the packaging. In order not to disrupt the sorting and recycling process, the packaging must be easy to empty.

The materials listed in the appendix that are marked **green** may be used.

All materials marked in **orange** and **red** are interfering materials for the recycling process.

The materials marked **orange** are tolerated, but are currently not recommended by the standard setter.

The materials marked in red may not be used.

Since the technical possibilities of the recycling industry are subject to immense change, the material list is reviewed every 2 years by the standard setter to ensure that it is up to date and, if necessary, adapted.

In addition, the following minimum requirements apply to the materials:

Paper packaging:

Fully recycled paper materials are to be preferred to virgin paper. The recycled content of paper packaging is at least 50%.

Raw paper materials come from either FSC or PEFC sources.

The paper must not be bleached with chlorine or chlorine derivatives. Only TCF is allowed.

In particular, wet strength agents, greaseproofing agents and finishes based on PFC are not permitted. Coatings and laminations must not be used on paper materials as a matter of principle.

Wood-based packaging:

The wood comes from FSC or PEFC sources. The packaging must be constructed in such a way that it is possible to separate different materials.

Plastic-based packaging:

The recycled content in the PET-plastics is at least 90%.

No multilayer constructions PP/PE or PET/PE. No different plastics on front and back.

Printing inks suitable for recycling (minimum standard: EuPIA-compliant printing inks). If labels or sleeves made of foreign materials are used, they are smaller than 50% of the packaging surface (see minimum standard NIR interfering materials).

No PETG sleeves or components in PET bottles.

No cellulose-based labels in firm contact with polyolefin packaging.

No silicone components.

Adhesives:

Only REACH compliant adhesives may be used.

8. Good Manufacturing Practice (GMP)

Any company that brings NCP-certified products on the market, must establish a quality management system (QM system) to ensure traceability and quality control in accordance with the HACCP and GMP for cosmetics (ISO 22716).

The QM system should also be expanded to include measures for environmental protection and sustainability as part of a continuous improvement. The Certified Sustainable Economics (CSE) Standard (www.cse-label.org) provides a good orientation for this requirement.

9. Conditions for Presenting

The products may be advertised as a “NCP Nature Care Product” and use the NCP Standard’s label for their product.

All base materials of the ingredients (for example: olive oil in soap) must be listed on the outside of the packaging in accordance with the INCI list, so far as the INCI provides information for the raw material. Ingredients should be listed in the prevailing official language(s) for the area(s) where the products are sold. All raw materials and catalyzers contained in the product, particularly pre-conservation and solvents must be listed by their INCI-appropriated name. If no INCI-appropriated name for the materials exist, then the product should indicate the common names used in the region.

A NCP-certified product may be labelled as a vegan natural product if no substance is of animal origin or is obtained from animal substances.

If the NCP-certified product contains certified organic ingredients, **the following conditions must be met:**

1. Information on the organic quality of the ingredients used can only be indicated in the compulsory “Index of Ingredients” if they are labeled in such a way that consumers can unambiguously and precisely distinguish to which ingredients the label applies. In this case, the statement "organic quality" refers to the biological starting material in accordance with the standard. An asterics (*) following the ingredient’s name, for example, may be used as a precise indication of organic quality. This rule applies for the phrase "organic" or "certified organic" and for all synonymously used terms and applies for all languages used on the product.
2. The proportions of the organic ingredients in relation to the total of components in the final product must be indicated as a percentage. The percentages should be given as whole numbers, fractions should be rounded up.

An example of an acceptable indication is: 100% of ingredients that apply for organic certification are certified organic, organic content of final product: 70%.

3. As mentioned in section 7.2, when calculating the percentages of organic ingredients, extraction agents should be managed as follows:
 - Organic ingredients are recorded in their full weight, for example, plant parts, pressed oils, pressed juices and essential oils.
 - Organic plant extracts can be recorded in their full weight, if the extracting agent (CO₂ for example) is no longer present in the final product or if the remaining extracting agent is also organic. Please use the following formula:

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

Where X = Percentage of organic material in the extract, P = Mass of the plant material used,

E = Mass of the extracting agent used

4. For concentrates, the weight before concentration is not reported. Additionally, the water used to reconstitute the concentrates should not be taken into account.

10. Change in Suppliers

In order to obtain a clear identification of the raw material, any change must be reported to the certification body. This concerns the supplier, the composition of the raw material and, if applicable, its manufacturing process. The standard setter recommends a supplier query also with regard to sustainability and human rights. The standard setter will provide templates for this on request.

Raw material suppliers may be changed without a notification to the NPC certifiers if the raw material in question is not subject to any restrictions. If the raw material is

subject to restrictions, continued compliance with the restriction must be demonstrated upon examination.

11. Exception

Products that have previously been certified according to EcoGarantie or IMO standard will be given a transitional period for conversion to NCP-compliant raw materials for the raw materials listed in the positive list. The transitional period is determined by the standard-owner and is also listed in the positive list. These products must be changed immediately from the mentioned certifications to NCP.