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, Ingenierubüro E.C. Schweig mbH and the working-group “ecological raw material”

Version 3.16 / 2024

www.gfaw.eu

Table of Contents

Introduction

The standard owner and developer GfaW Gesellschaft für angewandte Wirtschaftsethik mbH wants to promote organic farming, the transformation to petrochemical and GMO-free[1] "consumer products" produced with the closest possible proximity to natural processes. It assumes that products produced in this way are a lesser burden on the environment than conventional ones.

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.

All GfaW standards are not only open to any company that complies with the criteria but are explicitly an invitation to embark on the path of an economy that is sustainable and in harmony with the available resources.

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, Letterpress products, textile and leather care products, paints and varnishes, 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 2018/848.

[1] The standard owner is extremely critical of the genetic engineering process. At present, the risk in many places is not foreseeable. The achievements in medicine are indisputable. However, for products that consumers need in their everyday lives and would find in a supermarket, the risk is rather high if genetic engineering has been used in the process. Weighing up the benefits and risks for consumers, GfaW concludes that the risk outweighs the benefits and therefore advocates freedom from genetic engineering for the scope of the standard.

The NCP standard is supplemented by two lists: NCP list of compliant INCIs (Annex 1) and positive list for specific product groups and raw materials (Annex 2) and the material list for packaging. The list of compliant INCIs reflects all INCIs already assessed as compliant. Since an INCI can be produced in different ways - compliant and non-compliant with the standard - this list serves only as an orientation. In the field of biocides, the positive list corresponds to Annex II of the Implementing Rules 889/2008 of the former EU Organic Regulation. It is understood as an open list and can be extended by further compliant raw materials upon request.

The NCP label acts as an important guide for consumers to indicate certified natural care product in compliance with the standard.[2]

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 basis 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

[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.

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.

Impact and effects of the NCP standard

The goal of the standard is to replace petrochemical-based, GMO-oriented, and polluting products with less polluting products. This required that consumers recognize such products. Another goal is to promote recyclable packaging to contribute to the circular economy.
To achieve these goals, NCP provides a means of differentiation at the point of sale through its list of criteria for ingredients and packaging, as well as the labeling of products with the NCP seal.
Every product that is NCP certified helps realize the transformation to a petrochemical-free and circular economy.

Specifically, this means:

Lowest possible environmental impact:
- Criteria on CRM and SVHC substances - Ban.
- Criteria on H400 classification - final product must not be classified in the H400 range, unless this classification was made on the basis of natural essential oils
- Strict criteria on petrochemicals

As few products from genetic engineering processes as possible:
- Strict criteria on ingredients where genetic engineering is involved

Promotion of organic farming:
- Recommendation to use as many raw materials from organic farming as possible
- Mandatory organic quality for defined oils

Closest possible proximity to nature:
- If raw materials are obtained by means of chemical processes, these must correspond to the metabolic processes in plants/nature. They are listed in the standard.

Circular economy:
- Criteria on the design of packaging according to priority sequence.
- Criteria on the permitted materials according to the requirement to achieve the highest possible recyclability.

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)[3], regulation (EC) 1272/2008 (CLP) and regulation (EC) 1907/2006 (REACH), regulation on fertilizers (DüMV), the Plant Protection Act (Pflanzenschutzgesetz) and the so

[3] 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

called Supply Chain Law 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 use to produce NCP certified products. The appendix contains a positive list of all tolerated raw materials for biocides and plant protection agents (Annex 2). 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. Annex 1 is a list of INCIs that have already been assessed as compliant. This list is not a positive list in the strict sense.

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 based on the objectives of the NCP standard (see Impact).

NCP-certified products shall not contain SVHC substances (Substances of Very High Con- cerns)4 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)

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

result in H400-classification.

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.[5]

[5] 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).[6]

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.

The following natural substances originate at least from RSPO cultivation:

Palm oil and palm kernel oil

Raw materials whose cultivation is critical in terms of sustainability, such as palm oil, are only tolerated with a demonstrable consideration of priorities.

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

[6]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.

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 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 Annex 2. 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 Letterpress Products and 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".

4.4.4 Products for application on the body that are not covered by the Cosmetics Regulation

Products that are used on the human body but do not fall under the Cosmetics Regulation require preservation. For this purpose, the raw materials listed in the positive list in "Annex 2 for DIN EN 71 and others" are permitted.

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 EcoLabel[7]
- 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

[7] 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.

- 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-certified products.

7. Packaging and Instructions for Use

Valid for all packaging to be purchased from 01.01.2024. [8]

Natural products in environmentally harmful packaging do not go together. Especially not if the packaging gives a green impression even though it interferes with the recycling pro-

8 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 recyclate, scrap or cullet in packaging as possible. The use of recyclate, 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
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)

cess or is even non-recyclable. The standard sets its criteria against such greenwashing packaging:

These packaging criteria apply to products marketed under own brand or own production for end consumers. Packaging for B2B transport or sale is not covered here.

In principle, when using packaging materials and packaging materials, care should be taken to ensure that the packaging task can be fulfilled with the lowest possible overall impact (economic, social, ecological).

The impact is always to 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. Guiding question is: Is the packaging indispensable?

2nd Priority Reduce: Packaging that is necessary should use as little material as possible. Guiding question is: Can the packaging material be reduced e.g. by refill possibilities?

3rd priority Reuse: Prefer reusable to disposable packaging. This means that before disposable packaging made of recyclate is designed, it should be clarified whether a reusable system, regardless of its design, would not be possible. Guiding question is: Is there a reusable system for the planned packaging?

4. priority recyclability: recyclability of packaging and packaging materials, which is required by the EU and in Germany. This is not about a theoretical recyclability of materials, but about the recyclability of a complete packaging material (incl. closure and labels) in the existing recyclable material streams. Guiding question is: Is the packaging currently actually recyclable? Can it be easily allocated to the appropriate recyclable material streams by the consumer? [9]

5. priority dischargeability: residual dischargeability of the packaging. In order not to disturb the sorting and recycling process, the packaging must be easy to empty. Guiding question is: The packaging can be emptied of residues?

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

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

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

[9] In other words, the packaging / packaging materials should be marked in such a way that the consumer assigns them to the correct material stream. Furthermore, packaging and packaging materials must be automatically recognizable and sortable (NIR technology for sorting recyclable materials). In addition, it must be possible to process them in the existing material streams and convert them back to raw material / packaging material to an economical degree.

The materials marked in **red** may not be used.

Since the technical possibilities of the recycling industry are subject to immense change, the criteria and 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 materials:

Ban on PFAS.

The packaging used is free of perfluoroalkyl and polyfluoroalkyl substances. If PFAS are found in the current packaging, the company will present an action plan to replace the packaging with PFAS-free packaging by 2027.

Paper packaging:

Fully recycled paper materials shall be preferred to virgin paper.

The recycled content in paper packaging corresponds to at least 50%. (Exceptions are granted in the food sector for specific legal requirements for the packaging).

Raw paper materials shall come from either FSC or PEFC sources.

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 allowed. Coatings and laminations should generally not be used on paper materials.

Wood-based packaging:

The wood shall be from FSC or PEFC sources. Packaging must be constructed in such a way that separation of different materials is possible.

Plastic-based packaging:

No multilayer structures, except PE-/ PP-EVOH. If multilayer structures made of PE-EVOH and/or PP-EVOH are used, the company shall submit a plan of action for adapting the packaging to recyclable material by 2027. This does not apply to food products.

Requirements for the recycled content in plastic packaging in relation to the product type:

Material / Type of Product	Food	Cosmetics	Natural Product
PET	90%	90%	90%
PP	-*	50%**,***	80%**,***
PE	-*	50%**,***	80%**,***

*The possibility to use PE and/or PP with recycled content for food will be adapted to market conditions by the standard setter. Currently (as of end of 2023) there is no food compliance to be met with rPE and rPP.

** Unless an own recycling facility has been established and the return rate is not at 90% or the material to be purchased is contaminated with synthetic fragrances or genotoxic substances. In this case, the company will present an action plan on how it can gradually reduce the use of petrochemical-based virgin material by 2027.

*** Does not apply to product-contacting parts of the packaging if food conformity is required. Intelligent packaging solutions, e.g. with several layers that can be separated by consumers, are expressly desired.

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 tight contact with polyolefin packaging except for oversticker-ing standard labels or to save re-packaging.

No silicone components.

Adhesives:

Only REACH compliant adhesives may be used.

Glass packaging:

No permanently adhesive (non-water soluble/hydrophobic) large-area plastic labels.

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 Labeling

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

An NCP-certified product may be labeled as an "organic product" if at least 95% of the ingredients of agricultural origin are of organic quality.

An NCP-certified product may be labeled as a vegan natural product if it consists only of ingredients that have been produced neither from nor by or with the help of

animal substances. Any animal auxiliary materials such as gelatine filters or animal carriers are not permitted.

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.

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: 70% organic ingredients in the product, 100% of which are of organic quality.
   For reasons of space, this information can be given on the website instead of on the packaging.
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, microorganism in their dissolutions and essential oils.
   - For raw materials that have been re-diluted from concentrates, the water content is not calculated.

- Organic plant extracts can be recorded in their full weight, if the extracting agent (CO_2 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.

11. Control and Certification Procedures

The certification and inspection bodies approved by the GfaW standards operate in accordance with ISO 17065 and have many years of experience in certifying natural products. GfaW concludes contracts with the certification bodies for the performance of certifications according to the GfaW standards. These contracts regulate the inspection and certification procedure, qualifications of the assessing and auditing persons, frequency and intensity of assessment, sampling protocols for assessment, sources of evidence to be assessed, minimum content of assessment reports and deadlines for submission of completed reports following assessments. Monitoring of compliance with the contractually stipulated agreements is carried out by GfaW.

Certification procedure

There is a two-stage procedure for the certification of the products:

1st stage: testing of the products including proof of quality requirements according to the standard.

2nd stage: Initial audit of GMP basic requirements, packaging and labels

3rd stage: Annual monitoring audits

The certificate issued entitles the holder to use the respective mark, which is awarded by GfaW Gesellschaft für angewandte Wirtschaftsethik.

Further monitoring of conformity takes place through on-site audits depending on the risk classification.

Deviations and sanctions

If a product does not comply with the standard in stage 1 and 2, it does not receive a certificate. Stage 3 does not take place until all ingredients are compliant. The applicant then has time to change its formulation or replace the non-conforming raw materials.

If deviations from the standard are found in stage 3, reactions and sanctions take effect, up to and including withdrawal of the certificate and prohibition of the use of the mark.

Registration procedure

To register products, the company receives a notification file from the certification body or access to digital notification software. Companies registering products for the first time enter company data relevant for certification.

Listing of components for product registration

In the product registration, among other things, a listing of all ingredients contained in the product with contained INCI is required. This is not(!) only the INCI declaration of the product. All raw materials contained must be listed (if mixtures are used, such as pre-preserved plant extracts, also extraction agents and pre-preservation).

The type and materials of packaging must also be indicated.

Any change regarding conformity with the GfaW standards shall be communicated to the certification body without request and without delay.

Exchange with the certification body

For the quality assurance of the GfaW standards, the certification body shall draw up a report on non-conformities once a year. This report is subject to confidentiality and serves GfaW as a basis for topics in the working group meeting, determination of consulting needs and evaluation of the impact framework.

12. Publication of certified products

Certified products are published on the standard setter's website with the following information:

- Brand
- Product name
- Certification level (NCP or NCP-vegan)
- Certification date and expiration date
- Link to online or stationary shopping possibilities
- Optional: Information on application
- Optional: Information on sustainability