



IBD

CERTIFICAÇÕES



INGREDIENTES GUIDELINE ORGANIC AND NATURAL

Guidelines for organic and natural health and beauty products and organic and natural and vegan ingredients certification.



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1. INTRODUCTION AND JUSTIFICATION

These guidelines, developed by IBD Certifications, describe the criteria that must be met by cosmetics or personal hygiene products, and raw materials, in order to obtain IBD Natural Ingredient certification and/or NATRUE certification. NATRUE is a Brussels-based international non-profit association committed to promoting and protecting natural and organic cosmetics worldwide.

Additional information listed below and related to IBD Natural Ingredients certification can be found within the IBD Library - Guidelines (<https://www.ibd.com.br/guidelines-legislation/>):

Attachment 1: Step by Step Certification for Natural Ingredients (10_4_7), available at: https://www.ibd.com.br/wp-content/uploads/2019/09/10_4_7_Passo-a-passo-Certificação-Ingredientes-Naturais_En_08062018_V.pdf

Attachment 2 - Step by Step Certification for NATRUE (10_4_6), available at: https://www.ibd.com.br/wp-content/uploads/2019/09/10_4_6_Passo-a-passo-Certificação-NATRUE_En_08062018_V.pdf

Attachment 3 - Certification Flow – Natural Ingredients (10_4_7_1), available at: <https://www.ibd.com.br/wp-content/uploads/2019/10/Cosmetic-Flow.pdf>

Labeling Guide. Guide for creation and verification of product labels for cosmetic products certified by IBD, available at: https://www.ibd.com.br/wp-content/uploads/2019/09/8_1_2_C_E_IBD_Cosmetics_Guidelines_5thEd_082014_V.pdf

The legal instruments or other standards referenced in these guidelines are:

- Law 10.831/2003
- Law 11.105/2005
- Law 13.123/2015
- IN 18/2009
- IN19/2009
- EC 648/2004
- EC 834/2007
- EC 2001/18
- ISO 9235:2013
- ISO 11.733
- ISO 14.593
- ISO 11.734
- ISO 17065
- RDC 26/2015- MAPA

Additional information related to NATRUE certification is available from the NATRUE website under [manufacturer Information](#) (click the hyperlink or go to: <https://www.natrue.org/our-standard/natrue-criteria-2/>).

The list of inputs and products certified by IBD can be accessed on the IBD website at Customers> IBD Products and Customers (available at <https://www.ibd.com.br/customers/?certificados=&produto=&cliente=&country=&state=>).

The list of products certified by NATRUE can be accessed on the NATRUE website at NATRUE's certified products database (available at <https://www.natrue.org/our-standard/natrue-certified-world/>).

This 6th edition has been developed to update and align concepts and criteria for the IBD Natural Ingredients and NATRUE seals.

IBD Certifications' mission is to apply these guidelines to inspection and certification as per ISO 17065 requirements.

JUSTIFICATIONS

Technological advances, the search for personal health care improvements, and care for the natural environment, especially within the food sector, have significantly increased consumers' use of natural products. Consumers have changed their habits and are paying attention to the natural aspects of products when buying cosmetics and toiletries.

However, the comparison of what is natural in food items and cosmetics is distinct. The most relevant aspects of the natural theme within the food industry include natural occurrence, cultivation methods and traceability within the production chain. These aspects are represented within the different organic and natural seals. Natural cosmetics, in contrast, are usually a result of complex compositions, principally of natural raw materials, that are also processed, and therefore need to be evaluated differently.

One of the greatest challenges in developing natural cosmetics, beyond the selection of raw materials, is to offer consumers safe, efficient, and effective products with sensory qualities adapted to consumers. However, in general, products of this type cannot be made exclusively from pure natural ingredients. Aspects of sustainable development must be taken into account throughout the production chain, respecting biodiversity.

For natural cosmetics, questions arise as to which natural ingredients can be used without modification, which physicochemical modifications are required within a defined structure, and how substances that are identical to natural compounds are evaluated. Any defined evaluation criteria should be clear and understandable to the consumer, ensuring that he is sufficiently informed.

As there are still no established or globally recognized national or international organic certification rules, laws or guidelines for beauty and personal care products, these guidelines should be continually refined and adapted to national and international realities, in such a way as to be transparent and accessible to all stakeholders.

In Brazil, with the passing and enactment of Law 10,831, Decree 6,323, and related Normative Instructions, these standards were adapted to meet the same minimum concentration criteria used for organic ingredients in the "ORGANIC" and "MADE WITH ORGANIC INGREDIENTS" classifications when working with this specific Law 10,831.

Until national authorities issue specific regulations, these standards will be maintained in this format. For now, IBD's policy is to promote the certification of organic cosmetics, mainly for export. With regard to the domestic market, until the government takes a position, IBD's policy

is to promote certification of NATURAL cosmetics by offering a seal for “NATURAL INGREDIENTS” issued by the IBD or “NATURE” seal.

The definitions and concepts used in the IBD and NATRUE's Natural Ingredients guidelines have been established in order to provide cosmetic and personal care products consumers and manufacturers with transparency and clarity. Only natural, natural derived, and some identical natural raw materials may be used when meeting the requirements listed below.

1.2 SCOPE

These guidelines cover the certification of organic, natural and wild harvested ingredients, as well as the standards for certification of cosmetics and personal care products intended for the final consumer.

This standard is compatible with all international standards for body care and beauty products. If certification of raw materials or final product is intended for a specific international market, verification of product suitability to the market in question is recommended.

1.3 REGULATION

1.3.1 National Legislation

Regardless of formulation, all products and manufacturers must comply with current national legislation for cosmetics and personal care products, particularly with regards to the composition, safety, efficacy and labeling requirements. When certification is for cosmetics intended for the final consumer, IBD will only certify legally constituted companies, authorized by in Brazil by the National Sanitary Control Agency ANVISA, state or even municipal correspondents, in the case of products intended for marketing in Brazil. For ingredients, IBD will only certify legally constituted companies that have valid licenses issued by the agencies responsible for regulating the extraction and/or production of the respective ingredients.

1.3.2 Animal Testing and raw-materials of animal origin

Animal experimentation is fundamentally against IBD's ethical values and principles. Therefore, the use of animal testing for raw materials used in formulations, as well as for final product for marketing to the consumer, is prohibited.

The use of ingredients derived from vertebrate animals that must be sacrificed in order to obtain such material is prohibited. Ingredients of animal origin are only allowed when collected from living beings such as honey and its derivatives, milk and its derivatives, lanolin, etc., and provided that the producing animals are preferably reared within an organic production system.

1.3.3 Organic Production and Certification of raw-materials.

The organic raw materials used in formulations of natural and / or organic cosmetics must be certified organic according to the Brazilian Regulation Law 10.831 if the final products are to be sold in the Brazilian market. If sold in other markets, the ingredients must be certified according to the organic standards of the country of destination of the product.

The ingredients used in the processing of organic products must come from production coming from the Brazilian Organic Conformity Assessment System, as referenced in Joint Normative Instruction n. 18/2009 and / or n. 46/2011, until a specific standard for organic cosmetic and hygiene products is published.

1.3.4 Prohibited use of Genetically Modified Organisms (GMOs)

With regards to GMOs, the criterion refers to Joint Normative Instruction no. 18/2009, which prohibits the use of genetically modified organisms (including enzymes and microorganisms) or products (including raw materials and finished product) obtained using said organisms (IN 18, Article 11). These materials must also comply with the criteria established by Regulation (EC) 834/2007 (Article 9). The definition of GMOs is given by Brazilian Law 11.105 / 2005 (Article 3, items V and VI) and ECDirective 2001/18 / EC. This requirement also applies to substances not covered by the Regulation (e.g. certified non-organic ingredients, non-food or food substances). As a reference, a standard non-GMO compliance form template is included in **Attachment 4** of this guideline. The digital file can be requested from IBD.

1.3.5 Natural aromatic raw materials: ISO 9235

In natural cosmetics, natural fragrances that correspond to ISO 9235: 2013 (as essential oils) can be used. Isolated compounds of essential oils are included as well as essential oils that have been reconstituted from these compounds. Synthetic fragrances identical to natural compounds cannot be used in certified cosmetics. Natural fragrances must also comply with the other requirements of the IBD Guidelines. The Fragrance Guide is available in **Attachment 5** of this guideline and the ISO 9235 Declaration Template is located in **Attachment 6**. The digital file in **Attachment 6** can be requested from IBD.

1.3.6 Detergent surfactants

Detergent surfactants must be completely biodegradable according to European Regulation EC 648/2004:

- Primary aerobic biodegradability: at least 80% (OECD method or ISO 11733 equivalent)
- Final aerobic biodegradability (mineralization): at least 60% in 28 days (ISO 14593 method)
- Anaerobic biodegradability: at least 60% of final biodegradability (OECD 311, ISO 11734 or equivalent)

The DiD (Detergent Ingredients Database) list provides information on the biodegradability of various substances commonly used in cosmetic products.

As a reference, a template form regarding the compliance of detergent surfactant substances with European Regulation EC 648/2004 is included in **Attachment 7** of this guideline. The digital file can be requested from IBD.

1.3.7 Ionizing Radiation and Nanotechnology

The use of ionizing radiation, microwave emissions is prohibited.

For nanotechnology is also prohibited at any stage in the production process, including the manufacture and conservation of raw materials. This criterion is referenced in the Joint Normative Instruction no. 18/2009 for products classified as Organic or Natural with Organic Portion.

For products classified as Natural, nanotechnology is permitted solely for TiO₂ and ZnO.

1.3.8 Processing and Manufacturing

As indicated in section 1.3.1, all manufacturers must comply with current national legislation for cosmetics and personal care products. In addition to these requirements, other processing requirements, including good manufacturing practices, traceability records, segregation of processing lines for certified and non-certified items, pest control, and equipment and facility sanitation, can be verified in Joint Normative Instruction no. 18/2009.

1.3.9 Sustainability

1.3.9.1 The certificate issued by the nature conservation authority is required for natural raw materials (Item 2.1), when a starting material originates from animal and plant species that are under the restriction of the Convention on International Trade in Species of the Endangered Flora and Fauna (CITES) (Appendix I, available at <https://cites.org/eng/app/appendices.php>).

1.3.9.2 Natural raw materials must comply with the requirements of Law 13.123 / 2015, which deals with access to genetic heritage, protection and access to associated traditional knowledge and benefit sharing for the conservation and sustainable use of biodiversity.

1.3.9.3 Whenever possible and available, natural raw material derived from natural palm oil and palm kernel must be of RSPO certified origin (Round Table of Sustainable Palm Oil) at least as a Mass Balance, preferably as a Segregated or Preserved Identity. When not available, other sustainable certifications can also be accepted. If these are also not available, there will be a derogation from this criterion for a period to be defined. When available in certified organic form there will be no requirement for sustainable certification.

1.3.9.4 UN Sustainable Development Goals (United Nations)

Through its rules and procedures, IBD seeks to be in line with the UN Sustainable Development goals, especially with regard to the following:

- 3- Health and Wellness;
- 9- Industry, Innovation and Infrastructure;
- 12- Responsible consumption and production;
- 13- Action Against Global Climate Change;
- 14- Life in Water;

15- Earth Life.

Other goals are incorporated in other programs such as Fair Trade IBD.

1.4 IBD Principles

In order to facilitate the categorization and evaluation of raw-material, use of the Raw-Material Documentation Archive (ADMP) is recommended. The file is available from the IBD, along with a detailed explanation for filing, upon request. The digital files may be requested from the IBD.

For evaluation of raw materials, it is necessary to send documentation (technical data, declarations, certificates etc.) provided by the raw material manufacturer that proves suitability to the requirements of this guideline.

Requirements which must be met by manufacturers, and the cosmetics certified under this guideline, include:

- Lists of natural and naturally-derived substances approved for use in cosmetics;
- Descriptions of permitted manufacturing processes for natural cosmetics as well as naturally derived and nature-identical raw materials;
- Criteria for packaging and for certain shipping materials

Additionally, in order to obtain IBD certification, cosmetics must have the following characteristics:

- a) be formulated with organic and natural ingredients to the extent that this is possible;
- b) preserve the original qualities of the ingredients, to extent that this is possible, avoiding the modification of their natural state;
- c) cause the least possible impact on the environment, both during their production and during use and disposal;
- d) be of high quality and have clear labeling for consumers.

2. DEFINITION OF PERMITTED RAW-MATERIALS AND PROCESSES

In addition to water, which is the base and generally the most commonly used raw material in cosmetic products, natural raw materials that have not been modified (natural substances, such as oils and hydro-alcoholic plant extracts) predominate in natural cosmetics. As a reference, see Guide to Raw Material Classification in **Attachment 8** of this Guideline

2.1 Natural Raw Material

Natural raw materials are substances that are sourced from vegetable, inorganic-mineral (not organic minerals like mineral oil), or animal (except vertebrate) origin, or mixtures thereof.

Only the physical processes, including extractions using solvents and purifying agents, and compounds for adjusting pH and ion exchange, listed in Attachment 1 of the NATRUE standards are permitted. The attachment (CRITERIA ATTACHMENT - Version 3.8) is available at: <https://www.natrue.org/our-standard/natrue-criteria-2/>

Enzymatic and microbiological reactions are allowed only to the extent that the microorganisms and/or enzymes used are found in nature, and the products obtained are also identical to those used in nature.

Details about natural fragrances (such as essential oils) are found in item 1.3.5 with reference to ISO 9235: 2013.

As indicated in item 1.3.7, raw materials of plant or animal origin, as well as final products may not be subjected to ionizing radiation. The use of chlorine (sodium hypochlorite) for bleaching or the whitening of natural raw materials is not allowed.

2.2 Nature-Identical raw materials

Nature-identical raw materials may only be used when natural substances cannot be obtained from nature using reasonable technical effort. These raw materials are referenced in two positive lists in the NATRUE standard attachments, and only the listed ingredients may be used:

Attachment 2: Nature-identical Inorganic pigments and minerals

Attachment 4: Nature-identical Preservatives

The attachment (CRITERIA ANNEXES - Annexes Version 3.8) is available at: <https://www.natrue.org/our-standard/natrue-criteria-2/>

2.3 Naturally-Derived Raw Materials

The use of naturally-derived raw materials can only be justified if their function cannot be achieved by using natural raw materials. Naturally-derived raw materials should preferably come from organic sources.

Naturally-derived raw materials always originate from natural sources as defined in item 2.1 (e.g. fats, oils, waxes, polysaccharides, proteins and lipoproteins). In addition, they can only be used in the manufacture of natural cosmetic products if they are produced by chemical

reactions, including biotechnological processes. Naturally-derived raw materials can only be manufactured using processes modeled on physiological mechanisms (e.g., the formation of glycerides from fat digestion), with the number of chemical conversion steps being kept to a minimum.

Only the following reactions are allowed:

- Acylation
- Amidation
- Condensation (with water elimination)
- Dehydrogenation
- Dimerization
- Esterification
- Phosphorylation
- Glycosidation
- Hydrogenation
- Hydrogenolysis
- Hydrolysis (including saponification)
- Neutralization
- Oxidation (with oxygen, ozone and peroxides)
- Pyrolysis
- Sulfation
- Transesterification

All auxiliary substances and catalysts (including enzymes and microorganisms) that are not explicitly defined in this Guideline may be used in the following context: (a) improving sustainability in order to achieve better energy efficiency or (b) merely due to the inevitable technical alternative.

All auxiliary materials and catalysts, including enzymes and microorganisms, not explicitly defined in this can be used in the context of:

- Improve sustainability in order to obtain greater energy efficiency;
- Due to current or alternative technical issues.

Raw materials are classified as natural derivatives in all cases where:

- The catalyst used in the reaction must be non-enzymatic / non-microbiological.
- The enzyme / microbiological reaction produces final inputs that are not identical to those occurring in nature.
- Reactions are performed using recombinant microorganism isolated enzyme (s)

In all cases, auxiliary materials and catalysts must be completely eliminated after use, or at least considered to be present in a technically-unavoidable trace amount, and ineffective in the final product.

The environmental compatibility of naturally-derived raw materials used as personal care products (surfactants) should be assessed separately to ensure that they can be used without causing environmental problems. They must also meet the biodegradability requirements referred to in item 1.3.5.

Naturally-derived raw materials also include other inputs that occur in nature, but which cannot be recovered in sufficient quantities from their natural environment using current technologies.

Attachment 3 of the NATRUE Standards contains an open list of approved naturally-derived substances (indicated by the name INCI), which may meet the above requirements, provided that the manufacturer's supporting documentation is presented. This list may be updated regularly. The attachment (CRITERIA ANNEXES - Annexes Version 3.8) is available at: <https://www.natrue.org/our-standard/natrue-criteria-2/>

2.4 Preservatives

For the conservation of natural cosmetics, only the materials listed in Attachment 4 of the NATRUE standard may be used. For classification purposes, Attachment 4a lists nature-identical preservatives and Attachment 4b lists natural derivatives. These lists may be updated regularly. The attachment (CRITERIA ANNEXES - Annexes Version 3.8) is available at: <https://www.natrue.org/our-standard/natrue-criteria-2/>

2.5 Prohibited raw-materials

When ingredients are obtained from unnatural sources or through the use of prohibited reactions using a natural substance, this disqualifies their use in organic or natural cosmetic products.

Examples of prohibited raw materials are synthetic dyes, synthetic fragrances, polyethylene glycols (PEGs), ammonium quaternaries, silicones, synthetic preservatives, diethanolamides, petroleum derivatives, etc.

2.6 Manufacturing, processing and bottling

During all manufacturing, processing and packaging steps, unwanted inputs and substances derived from these processes, or from packaging and storage, must not contaminate the final product.

In addition, the following should be noted:

- Companies that manufacture organic and/or natural cosmetic products must be legally registered with the National Sanitary Control Agency (ANVISA) and must comply with the current legislation governing cosmetics.
- Certified producers must ensure that there is no mixing of organic or natural ingredients or cosmetics with conventional products during storage, transportation and production.
- Cleaning and sanitary measures should be described and documented, taking care to avoid contamination by cleaning products used on equipment prior to use during organic or natural processing.
- Pest control measures must comply with current legislation in order to prevent contamination of organic and/or natural products.

3. PRODUCT CLASSIFICATION

Both for raw materials to be approved or certified and for the final product to be certified.

3.1 Natural Cosmetics with IBD or VEGANO IBD Natural Ingredients seal or with NATRUE Natural Cosmetics seal

Natural cosmetics are those that meet the requirements of this guideline, and preferably, but not necessarily, contain some percentage of organic raw materials in their composition.

The seals used for this classification are:



Attachment 9 includes Table 1 - requirements to be met for certification, by product category.

3.2 Organic Cosmetics under Brazilian Law 10.831 / 2003

In addition to the requirements described in item 3.1, cosmetics for classification as organic must contain at least 95% organic raw materials (or 70% organic raw materials - labeled as Made with Organic Ingredients), which have been certified within the Brazilian System for Organic Conformity Assessment (Brazilian Regulation Law 10.831) and Joint Normative Instruction no. 18/2009 and 19/2009

The seal used for this classification is SISORG (Brazilian System of Organic Conformity Evaluation by law Lei 10.831/2003) seal. IBD is accredited by MAPA for this activity.

3.3 Organic Cosmetics under the IBD Cosmetic Standard and NATRUE standard

At least 95% of the natural substances found in the product, from plant and animal origin and derived from natural sources, must come from controlled organic management and/or controlled wild harvesting, in compliance with criteria stipulated by the European Union Eco-Regulation [Regulation (EC) No 834 / 2007, the USDA National Organic Program (NOP), BR 10,831 or an IFOAM Family of Standards.

The seals used for this classification are:



Annex 9 shows Table 1, which represents the requirements by product category to be met for certification by the NATRUE standard.

3.3.1. The Natural category with NATRUE Organic Portion has been eliminated

3.3.1 Raw materials

The raw materials or ingredients can only be classified and certified as “organic raw material” if it is in accordance with the criteria described in item 3.3.

3.4 The IBD NATURAL AND VEGAN INGREDIENTS seal

The demand for guarantees for cosmetic products as well as food, free of substances derived from animals, is increasing steadily.

To this end, IBD created the seal that will guarantee not only through a documentary conference, but also through face-to-face audits the optional, non-inclusion of substances, raw materials of origin or derived from animals.

In VEGAN certified products, in addition to the guarantee that they are all natural raw materials, these, also with an audit guarantee, will not be made from animal ingredients or even derived from animals.

What are vegan products?

- 1) They are raw materials or final products that were generated or manufactured without testing on animals of any kind.
- 2) They are raw materials or final products generated or manufactured without substances from vertebrate or invertebrate animals including adjuvants, additives, coloring catalysts, sweeteners, stabilizers, emulsifiers, and that the latter have also not been generated with animal products.
- 3) Vegan certification does not exempt the company from complying with the legislation and making statements regarding the allergenic issue of products and the possible existence of allergenic substances.
 - a. <https://www.gov.br/mj/pt-br/assuntos/noticias/rotulos-de-alimentos-devem-informar-ingredientes-alergenicos>
 - b. <https://www.gov.br/mj/pt-br/assuntos/noticias/rotulos-de-alimentos-devem-informar-ingredientes-alergenicos/ConsumoeSaden43AlimentosAlergnicos.pdf>
 - c. <https://www.gov.br/anvisa/pt-br/assuntos/noticias-anvisa/2018/disponivel-novo-guia-sobre-controle-de-alergenicos>

Therefore, substances and derivatives of:

Milk products:	lactic acid; casein; caseinates; milk cream; yogurts; powdered milk; lactalbumin; lactitol; lactoglobulin; lactose; lactosorro; butter; cheeses; whey proteins.
Derivatives of eggs:	albumin; powdered egg white; powdered egg yolk; globulin; lysozyme; ovalbumin; egg lecithin.
Honey Derivatives:	Apitoxin; Wax; Royal jelly; Propolis; Pollen.
Derivatives of animal origin: marine animals, cattle, insects, sheep, fish, pigs, birds or any animal species.	Silk Amino Acid; Collagen and elastin, leather, gelatin, bones, cartilage; Carmine, Cochineal, Carminic Acid; Shellac; Fats; Guanine; Lanolin; Keratin (obtained from the protein extracted from the mane, feathers and horns of some animals); Tallow or Animal Oils;
Hydrolyzed Proteins	(potentially can be of animal origin).

This seal can be applied to both cosmetics and food by IBD.

4. LABELING

The labeling of natural or organic cosmetics must comply first and foremost with the labeling and classification rules for cosmetic products, as set forth by current national legislation.

Products may use specific labeling statements that highlight their classification as natural or organic (in this case, next to the ingredient list and on the back of the label), and specify the total percentages of natural and organic ingredients on both the secondary and primary label.

For further information on seal colors, sizes, position and other graphic information, please refer to the IBD Labeling Guide (Guide for Designing and Verifying IBD Certified Cosmetic Product Labels, available at: <https://www.ibd.com.br/wp-content/uploads/2019/07/2.pdf>)

or the NATRUE LABEL GUIDE Labeling Guide, available at: <https://www.natrue.org/our-standard/certify-finished-products/>.

4.1. Natural Cosmetics And VEGANO Cosmetics

Natural cosmetic labels should specify which ingredients are natural and/or organic, and/or sourced from certified wild harvesting. The label may indicate that the product contains natural and/or organic ingredients. If you use the word organic, it can only be used on the back of the product label, next to the list of components. In this case, use the IBD Natural Ingredients seal or NATRUE Natural Cosmetics seal, indicated below.



For those who have opted for the Vegan scope, the seal can be used:



4.2. Organic or Natural Cosmetics with Organic Portion under the IBD Standard for Cosmetics in Equivalence with the NATRUE standard.

Organic cosmetics should highlight which organic ingredients are used, and may use the IBD Organic or NATRUE seals. They are required to use the seal in compliance with the criteria set forth in the Labeling Guide or in the NATRUE labeling instructions. This labeling will be for exported or domestic products only if particular organic cosmetic labeling protocols are authorized.

The stamps used for this classification are:



4.3. Organic Cosmetics or “Made with Organic Ingredients” under Brazilian Law

Organic cosmetics should highlight which organic ingredients are used, and can use the “IBD Organic” seal.

They are required to use the Brazilian Organic Conformity Assessment System (SISOrg) seal, in compliance with the criteria presented in the IBD Labeling Guide.

(Natural category with NATRUE Organic Portion eliminated.)

5. PACKAGING MATERIAL REQUIREMENTS

- Packaging material must be produced using environmentally friendly methods;
- As far as possible, packaging should be kept to a minimum;
- If possible, products should be developed for multiple uses;
- If technically feasible and available, packaging materials should be recyclable (e.g. glass, aluminum, paper/cardboard or recyclable plastics such as PET (polyethylene terephthalate), PP (polypropylene) and, if possible, from renewable materials;
- Halogenated plastics are prohibited (such as polyvinyl chloride - PVC);
- Gas packaging may be pressurized only with air, nitrogen, oxygen, carbon dioxide and/or argon (but without VOC - volatile organic compounds). Gases are not considered in percentage calculations for natural or organic ingredients.

6. CERTIFICATION STEPS

The Certification Flow and Step by Step Guideline with all information regarding the Natural Ingredients' certification process is available in Attachment 1 to 3 of this Guideline, as follows:

- **Attachment 1:** Step by Step Certification of Natural Ingredients (10_4_7), available: https://www.ibd.com.br/wp-content/uploads/2019/09/10_4_7_Passo-a-passo-Certificação-Ingredientes-Naturais_En_08062018_V.pdf
- **Attachment 2** - Step by Step NATRUE Certification (10_4_6), available at: https://www.ibd.com.br/wp-content/uploads/2019/09/10_4_6_Passo-a-passo-Certificação-NATRUE_En_08062018_V.pdf
- **Attachment 3** - Certification Flow Chart - Natural Ingredients (10_4_7_1), available at: <https://www.ibd.com.br/wp-content/uploads/2019/10/Cosmetic-Flow.pdf>

7. LIST OF ATTACHMENTS

Attachment 1: Step by Step Certification of Natural Ingredients

Attachment 2: Step by Step NATRUE Certification

Attachment 3: Certification Flow Chart – Natural Ingredients

Attachment 4: Non-GMO Declaration

Attachment 5: Fragrance Guide

Attachment 6: Declaration of Conformity with ISO 9235

Attachment 7: Declaration of Biodegradability - Tensioactive Substances

Attachment 8: Guide to the Classification of Raw-Materials

Attachment 9: Table 1 - Requirements for certification, by product category

Attachment 10: Glossary

Attachment 1: Step by Step Certification of Natural Ingredients

IBD CERTIFICAÇÕES

Natural Ingredients Certification

Step by step

Welcome to IBD!

We have prepared this guide to provide you with all the necessary information about the Natural Ingredients certification process.



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Terms and definitions

Accreditation: formal acknowledgment by an accreditation body, that a certification body meets previously defined requirements and demonstrates competence to perform its activities with confidence.

Appeal: any request from a client for IBD to reconsider a decision referring to compliance assessment.

Inspection: systematic documented and independent process for obtaining and assessing evidences to determine the extension to which certification requirements are met.

Certificate of conformity: certification document attesting compliance of inspected client's management system and products to certification scheme.

Certification cycle: steps sequence of the certification process that must be repeated to maintain (renew) the Certificate of Conformity.

Certification decision: decision taken by the certification body with regards to fulfilment of products and processes' certification requirements.

Certification requirements: criteria established by the certification scheme as a condition to obtain or maintain the certification.

Certification scheme: certification system related to specific products for which the same requirements, rules and procedures (defined by the scheme owner) apply.

Certification scope: identification of products, processes or services and certification scheme with its normative documents against which certification is granted.

Complaint: expression of dissatisfaction, other than appeal, manifested by clients or third parties, about IBD's certification activities.

Compliance: fulfilment of certification scheme's requirements.

Mark of accreditation: mark of the accreditation body responsible for the accreditation of the certification body to certify the product or service.

Mark of conformity: mark attesting the conformity of the product or service to certification scheme requirements that can be used on products and communication materials by the means of licensing. Marks of conformity ["seal"] are normally registered and protected legally against any abusive use.

Non compliance: non fulfilment of certification scheme requirements.

Scheme owner: person or organization responsible for the development and maintenance of a certification scheme.

Objectives and applicable certification scheme

We made this guide to provide you with all necessary information about the IBD Natural Ingredients certification process.

The certification scheme covered by this document is the IBD Guidelines for Certification of the Products Health and Natural Beauty and Natural Raw Materials.

It allows for marketing natural cosmetics and products with IBD Natural Ingredients seal.

IBD is the owner and manager of this scheme.

The Guideline is available on IBD website, or upon request.

The Certification Cycle is annual, and the Certificate of Conformity is issued/renewed when all certification requirements are met.

The **Certification cycle** is made of the main steps below:



Audit preparation

Our team will send you a Management Plan template to be filled in with all relevant information about your operations. It is crucial to fill this document in thoroughly since it will optimize the conduction of the audit.

The auditor assigned by IBD will analyze your Management Plan and relevant documentation, in order to draw a critical vision of its comprehensiveness, to detect eventual shortcomings and to request complements when necessary. This assessment will be formalized in writing, together with the Audit Plan and the list of documents, resources and records that shall be available during the audit.

The Audit Plan can be adjusted in common agreement between the client and the auditor, to meet your operations' characteristics and agendas' availabilities.

Audit

At the beginning of the audit, the auditor proceeds to an opening meeting, to clarify how the assessment will be done and what rules apply to the certification scope. This is the ideal moment to clear any doubts and to adjust the Audit Plan as necessary.

The audit is performed based on the Audit Plan, observing the specific requirements of applicable standards. The auditor needs always be accompanied by guides assigned by the client at the opening meeting.

The evaluation methods are based on:

- Interviews;
- Observation of activities;
- Documents and records analysis;
- Observation of equipment, areas and facilities.
- Comparison inputs – production – sales – stock;
- Traceability exercise;
- Sample collection (if applicable);
- Identification and investigation of risk areas;
- Check on previous non compliances situation;
- Critical analysis of received complaints and corresponding corrective actions.

Potential non-compliances are immediately communicated to the client, ensuring a full knowledge and understanding of the situation.

At the end of the audit, the auditor formalizes the results in a closing meeting.

Any differences of opinion regarding the findings of the audit are discussed and, if possible, resolved. If not resolved, they are recorded for posterior evaluation by IBD.

Report evaluation and Certification Decision

IBD technical staff evaluates the audit report, its quality and the coherence of information and formalizes the result in the Certification Decision.

At this stage the recommendation and findings of the auditor might be altered.

Granting certification

When an audit's evaluation results in a positive decision, IBD issues or renews the client's Certificate of Conformity, valid for 1 year from the date it is issued.

Clients' data requested by the certification scheme are displayed on IBD website.

Maintaining certification / surveillance

Annually IBD renews the full Certification Cycle, to ensure the maintenance (renewal) of the Certificate of Conformity.

While the Certificate of Conformity remains valid, the client may trade its products and make claims about its certification using the marks of conformity (seals), always respecting the applicable requirements.

IBD may conduct unannounced audits at any time, according to the certification scheme requirements, to operations with higher risk level or for investigation of potential non compliances or complaints.

Refusing certification

According to the scheme requirements it is possible for IBD not to issue the Certificate of Conformity. That happens when certification requirements are not met within the initial Certification Cycle. In such case, IBD will notify the motives and explain what steps are necessary to obtain certification.

Suspending / Withdrawing certification

When the evaluation of an audit or when the investigation of a complaint results in non-compliance, or when the client does not fulfill any aspect of the contract signed with IBD, or the requirements applicable to the certification scope, IBD will notify the non-compliance to the client, always informing the deadline for correction or appeal.

If the client submits evidences of resolution of all non-compliances within the established deadline, IBD will notify formally the resolution and proceed with the maintenance of the certification.

If not, IBD will notify formally the client, according to rules applicable to the certification scheme, a Proposed Suspension or Cancellation/Revocation, as well as the deadline for correction or appeal.

Lack of resolution or appeal within the established deadline will lead to Suspension of the Certificate of Conformity.

In such case the client's data will be removed from IBD website.

Not performing an audit within the deadline established by the certification scheme also implies in suspending the Certificate of Conformity.

Scope extension or reduction

Clients must inform IBD about all changes related to the certification, in particular changes of management system, production units, certified products and volumes.

When certified clients request a change of scope, IBD will evaluate if there is a need for updating the Commercial Proposal initially agreed.

The inclusion of new products under the same scope or a certified product volume increase might be possible by means of a desk-top evaluation. In such case IBD will request the necessary documentation (such as flowchart, recipe, used inputs, production estimate, labels, etc.) and will decide if an additional audit will be necessary.

The certification of new production units and products from other scopes necessarily implies in performing a new audit.

Upon conclusion of the evaluation process IBD will notify the result and make the necessary changes of the Certificate of Conformity and update the data on IBD website and on the scheme owner's database, when applicable.

Use of marks of conformity

IBD verifies the correct use and exhibition of certificates and marks of conformity of the certification scheme owner, mainly on labels of certified products, but also on communication materials such as website, announcements, folders, brochures, business cards, etc.

The incorrect use of marks of conformity and certificates is notified to the client and appropriate action is requested, such as corrective actions, certificate suspension, communication to ruling authorities, legal action, etc. depending on the level of non-compliance.

Complaints and appeals

IBD has procedures in place (available upon request) for receiving, treating and recording efficiently and impartially Complaints and Appeals.

Upon reception of a complaint or appeal, IBD acknowledges receipt formally. All the decision process to solve the complaint or appeal is made by, or reviewed and approved by, person(s) not involved in the related certification activities, in order to maintain impartiality.

The result is reported to the complainant / appellant, in a way that does not threaten the confidentiality of the involved parties.

Submitting complaints and appeals is important for IBD to always improve the quality of its services. Feel free to use for this purpose all channels we provide you: telephone, fax, website, e-mail.

Samples collection

The collection and laboratory analysis of samples of products, soil, water, inputs, tissues and other materials relevant to the certification activities are sometimes necessary to the certification process.

It aims at confirming the fulfilment of legal or standards' parameters, the presence or absence of contamination by substances that are prohibited or restricted by certification standards, and for taking subsequent suitable decisions according to the result.

The collection and analysis of samples are necessary whenever there is a suspicion of use of prohibited substances/methods or contamination of the certified product by prohibited substances.

All samples collected by our auditors are analyzed by previously qualified laboratories, accredited against ISO17025.

Services evaluation

IBD highly values the opinion of its clients and for this reason invites you to appraise our services upon conclusion of each certification process, by the means of a Satisfaction Survey.

Your opinion is very important as it helps us to continuously improve the quality of our services.

IBD

CERTIFICAÇÕES

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IBD CERTIFICAÇÕES

Natrue Cosmetics Certification

Step by step

Welcome to IBD!

We have prepared this guide to provide you with all the necessary information about the Natrue Cosmetics certification process.



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Terms and definitions

Accreditation: formal acknowledgment by an accreditation body, that a certification body meets previously defined requirements and demonstrates competence to perform its activities with confidence.

Appeal: any request from a client for IBD to reconsider a decision referring to compliance assessment.

Inspection: systematic documented and independent process for obtaining and assessing evidences to determine the extension to which certification requirements are met.

Certificate of conformity: certification document attesting compliance of inspected client's management system and products to certification scheme.

Certification cycle: steps sequence of the certification process that must be repeated to maintain (renew) the Certificate of Conformity.

Certification decision: decision taken by the certification body with regards to fulfilment of products and processes' certification requirements.

Certification requirements: criteria established by the certification scheme as a condition to obtain or maintain the certification.

Certification scheme: certification system related to specific products for which the same requirements, rules and procedures (defined by the scheme owner) apply.

Certification scope: identification of products, processes or services and certification scheme with its normative documents against which certification is granted.

Complaint: expression of dissatisfaction, other than appeal, manifested by clients or third parties, about IBD's certification activities.

Compliance: fulfilment of certification scheme's requirements.

Mark of accreditation: mark of the accreditation body responsible for the accreditation of the certification body to certify the product or service.

Mark of conformity: mark attesting the conformity of the product or service to certification scheme requirements that can be used on products and communication materials by the means of licensing. Marks of conformity ["seal"] are normally registered and protected legally against any abusive use.

Non compliance: non fulfilment of certification scheme requirements.

Scheme owner: person or organization responsible for the development and maintenance of a certification scheme.

Objectives and applicable certification scheme

We made this guide to provide you with all necessary information about the NATRUE certification process.

The certification scheme covered by this document is the NATRUE Label Requirements & Annexes (NATRUE), based on the NATRUE Requirements for Certification Bodies and the NATRUE label usage guidelines.

It allows for marketing natural and organic cosmetics with NATRUE seal.

NATRUE is the owner and manager of this scheme, and IOAS is responsible for the ~~accreditation~~ ^{www} of the certification bodies.

Applicable standards, evaluation procedures and certification extension procedures are available on the scheme owner's website and through the link displayed on IBD website, or upon request.

The Certification Cycle is of 2 years, and the Certificate of Conformity is issued/renewed when all certification requirements are met.

The **Certification cycle** is made of the main steps below:



Evaluation procedures

Certification request

IBD sends to the requestor a Commercial Proposal Request Form, aiming at collecting all necessary information in order to comprehend well your need and provide you with customized commercial services.

Critical analysis of certification request

IBD Commercial Management performs a critical analysis of the certification request against ISO17065 requirements, in order to clear any doubt and guarantee that IBD has the necessary competence and resources to perform the service.

If the requestor is already certified - or its certification was denied / suspended / cancelled – for the required scheme, we'll proceed to our Certification Transfer Procedure (available upon request) in order to ensure continuity of the process done by the previous certification body.]

In case it is not possible to attend your demand at the moment, IBD will inform you the motives.

Commercial proposal

IBD Commercial Management submits a Commercial Proposal based on the information sent by the requestor and on IBD Prices and Certification Criteria (available upon request).

Inspection time varies according to certification scheme requirements, as well as complexity, size and risks of the operation.

IBD is a private owned company and sustains its activities exclusively from fees charged for our certification services.

Certification contract

By signing the Commercial Proposal, the requestor manifests its agreement with the terms and conditions established in the Certification Services Contract, available on IBD website.

This contract informs about rights and obligations of clients, including the requirements for use of IBD name and marks of conformity or accreditation.

Inspection preparation

Our team will send you a Management Plan template and applicable NATRUE forms to be filled in with all relevant information about your operations. It is crucial to fill this document in thoroughly since it will optimize the conduction of the inspection.

The main documents and records that should be maintained and be available to allow compliance checking are:

- General information about the production unit (name, address, federal tax registration, licenses and product registration, person in charge, percentage of natural cosmetics products...);
- NATRUE Level 1 worksheet – filled in by the client with the details of formulation of each product and corresponding NATRUE Raw Material Documentation File with the details of each ingredient of the formulation, always using INCI names;
- Technical data about the ingredients, its origin and production means (FISPQ, MSDS, certificate of analysis, non-GMO affidavits, declaration about testing on animals...). For this purpose, the NATRUE website provides templates of Non-GMO and ISO9235 declaration, information on how to classify the raw-materials, as well as annexes with the ingredients already included in NATRUE list;
- Purchase receipts of ingredients, production, marketing and stock;
- Certified products' labels graphic arts;
- Effective date of marketing and countries of destination.

The inspector assigned by IBD will analyze your Management Plan and relevant documentation, in order to draw a critical vision of its comprehensiveness, to detect eventual shortcomings and to request complements when necessary. This assessment aims at ensuring that the client is able to comply with all NATRUE certification requirements, and will be formalized in writing.

If some derived natural or nature identical substances informed in the formulation are not listed in the NATRUE standards, IBD will request to NATRUE their inclusion in the annexes of the criteria.

Upon NATRUE Scientific Committee's feedback the client will conclude the formulation and the inspector assigned by IBD will review again the documentation.

Preliminary certificate issue

After confirming the adequacy of the client's documentation with the NATRUE requirements, IBD will upload the information on NATRUE label extranet and issue the Preliminary Certificate.

Inspection

At the beginning of the inspection, the inspector proceeds to an opening meeting, to clarify how the assessment will be done and what rules apply to the certification scope. This is the ideal moment to clear any doubts and to adjust the schedule as necessary.

The inspection is performed based on the specific requirements of applicable standards. The inspector needs always be accompanied by guides assigned by the client at the opening meeting.

The evaluation methods are based on:

- Interviews;
- Observation of activities;
- Documents and records analysis;
- Observation of equipment, areas and facilities;
- Comparison inputs – production – sales – stock;
- Traceability exercise;
- Sample collection (if applicable);
- Identification and investigation of risk areas;
- Check on previous non compliances situation;
- Critical analysis of received complaints and corresponding corrective actions.

Potential non-compliances are immediately communicated to the client, ensuring a full knowledge and understanding of the situation.

At the end of the inspection, the inspector formalizes the results in a closing meeting.

Any differences of opinion regarding the findings of the inspection are discussed and, if possible, resolved. If not resolved, they are recorded for posterior evaluation by IBD.

Report evaluation and Certification Decision

IBD technical staff evaluates the inspection report, its quality and the coherence of information and formalizes the result in the Certification Decision.

At this stage the recommendation and findings of the inspector might be altered.

Granting certification

When an inspection's evaluation results in a positive decision, IBD issues or renews the client's Certificate of Conformity, valid for 2 years from the date it is issued.

Clients' data requested by the certification scheme are displayed on IBD website and client's products are activated on NATRUE label extranet.

Maintaining certification / Surveillance

Every 2 years, IBD renews the full Certification Cycle, to ensure the maintenance (renewal) of the Certificate of Conformity.

While the Certificate of Conformity remains valid, the client may trade its products and make claims about its certification using the marks of conformity (seals), always respecting the applicable requirements.

IBD may conduct unannounced inspections at any time, according to the certification scheme requirements, to operations with higher risk level or for investigation of potential non compliances or complaints.

Refusing certification

According to the scheme requirements it is possible for IBD not to issue the Certificate of Conformity. That happens when certification requirements are not met within the initial Certification Cycle. In such case, IBD will notify the motives and explain what steps are necessary to obtain certification.

Suspending / Withdrawing certification

When the evaluation of an inspection or when the investigation of a complaint results in non-compliance, or when the client does not fulfill any aspect of the contract signed with IBD, or the requirements applicable to the certification scope, IBD will notify the non-compliance to the client, always informing the deadline for correction or appeal.

If the client submits evidences of resolution of all non-compliances within the established deadline, IBD will notify formally the resolution and proceed with the maintenance of the certification.

If not, IBD will notify formally the client, according to rules applicable to the certification scheme, a Proposed Suspension or Cancellation/Revocation, as well as the deadline for correction or appeal.

Lack of resolution or appeal within the established deadline will lead to Suspension of the Certificate of Conformity.

In such case the client's data will be removed from IBD website and from NATRUE label extranet.

Not performing an inspection within the deadline established by the certification scheme also implies in suspending the Certificate of Conformity.

Scope extension or reduction

Clients must inform IBD about all changes related to the certification, in particular changes of management system, production units, certified products and volumes.

When certified clients request a change of scope, IBD will evaluate if there is a need for updating the Commercial Proposal initially agreed.

- Inclusion of new products processed by a productive unit that has already been audited:

A second audit is not required when additional products are certified within a year of the performance of the original audit. In this case, IBD will request sufficient documentation and information (such as flowchart, formulation, used inputs, production forecast, labels, etc.) and proceed to a desktop evaluation.

The inclusion of additional products after this deadline requires a new audit.

- Inclusion of new products processed by a productive unit that has not been audited:

At the discretion of IBD, under its sole responsibility, the inclusion of products processed in non-audited sites is possible upon observation of NATRUE Requirements for Certification Bodies, item 7.2.5.

Upon conclusion of the evaluation process, IBD will notify the result and make the necessary changes of the Certificate of Conformity and update the data on IBD website and NATRUE label extranet.

Use of marks of conformity and accreditation

IBD verifies the correct use and exhibition of certificates and marks of conformity of the certification scheme owner and/or of the accreditation body, mainly on

labels of certified products, but also on communication materials such as website, announcements, folders, brochures, business cards, etc.

The incorrect use of marks of conformity and certificates is notified to the client and appropriate action is requested, such as corrective actions, certificate suspension, communication to ruling authorities, legal action, etc. depending on the level of non-compliance.

Complaints and appeals

IBD has procedures in place (available upon request) for receiving, treating and recording efficiently and impartially Complaints and Appeals.

Upon reception of a complaint or appeal, IBD acknowledges receipt formally. All the decision process to solve the complaint or appeal is made by, or reviewed and approved by, person(s) not involved in the related certification activities, in order to maintain impartiality.

The result is reported to the complainant / appellant, in a way that does not threaten the confidentiality of the involved parties.

Submitting complaints and appeals is important for IBD to always improve the quality of its services. Feel free to use for this purpose all channels we provide you: telephone, fax, website, e-mail.

Samples collection

The collection and laboratory analysis of samples of products, soil, water, inputs, tissues and other materials relevant to the certification activities are sometimes necessary to the certification process.

It aims at confirming the fulfillment of legal or standards' parameters, the presence or absence of contamination by substances that are prohibited or restricted by certification standards, and for taking subsequent suitable decisions according to the result.

The collection and analysis of samples are necessary whenever there is a suspicion of use of prohibited substances/methods or contamination of the certified product by prohibited substances.

All samples collected by our inspectors are analyzed by previously qualified laboratories, accredited against ISO17025.

Services evaluation

IBD highly values the opinion of its clients and for this reason invites you to appraise our services upon conclusion of each certification process, by the means of a Satisfaction Survey.

Your opinion is very important as it helps us to continuously improve the quality of our services.

IBD

CERTIFICAÇÕES

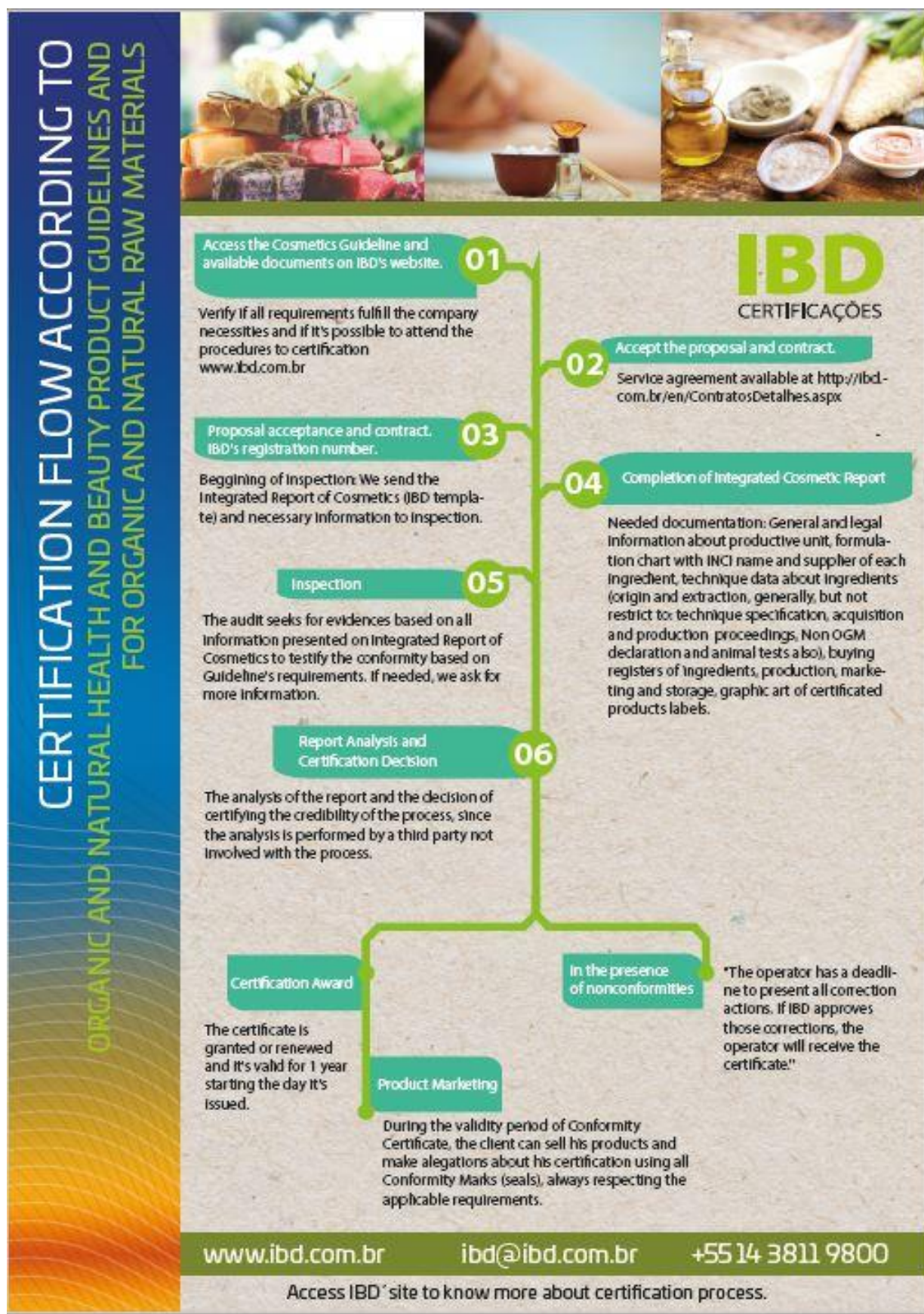
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Attachment 3: Certification Flow– Natural Ingredients



Attachment 4 – Non-GMO Declaration



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NATRUE Non-GMO declaration

Non-GMO declaration for organic and non-organic cosmetic ingredients

According to the NATRUE Label Criteria requirements on the prohibition on the use of Genetically Modified Organisms (GMOs) (Section 1.2.3) the compliance criterion refers to manufacture neither "from" nor "by" GMOs as laid down in the Regulation (EC) No. 834/2007 (Article 9). The definition of a GMO is that given in Directive 2001/18/EC. The prohibition criterion also applies to substances which are not covered by this Regulation (e.g. non-organic certified ingredients, non-food or –feed substances).

VENDOR DECLARATION

Name, address of vendor:

Product name:

INCI(s):

I declare that this product was manufactured neither "from" nor "by" GMOs as those terms are used in Articles 2 and 9 of the Council Regulation (EC) No. 834/2007. I do not have any information which could suggest that this statement is inaccurate.

I undertake to inform the NATRUE approved certifier immediately if this declaration is withdrawn or modified, or if any information comes to light which would undermine its accuracy.

The undersigned takes responsibility for the accuracy of this declaration

Country, place, date and signature of vendor¹

Company stamp of vendor
(if appropriate)

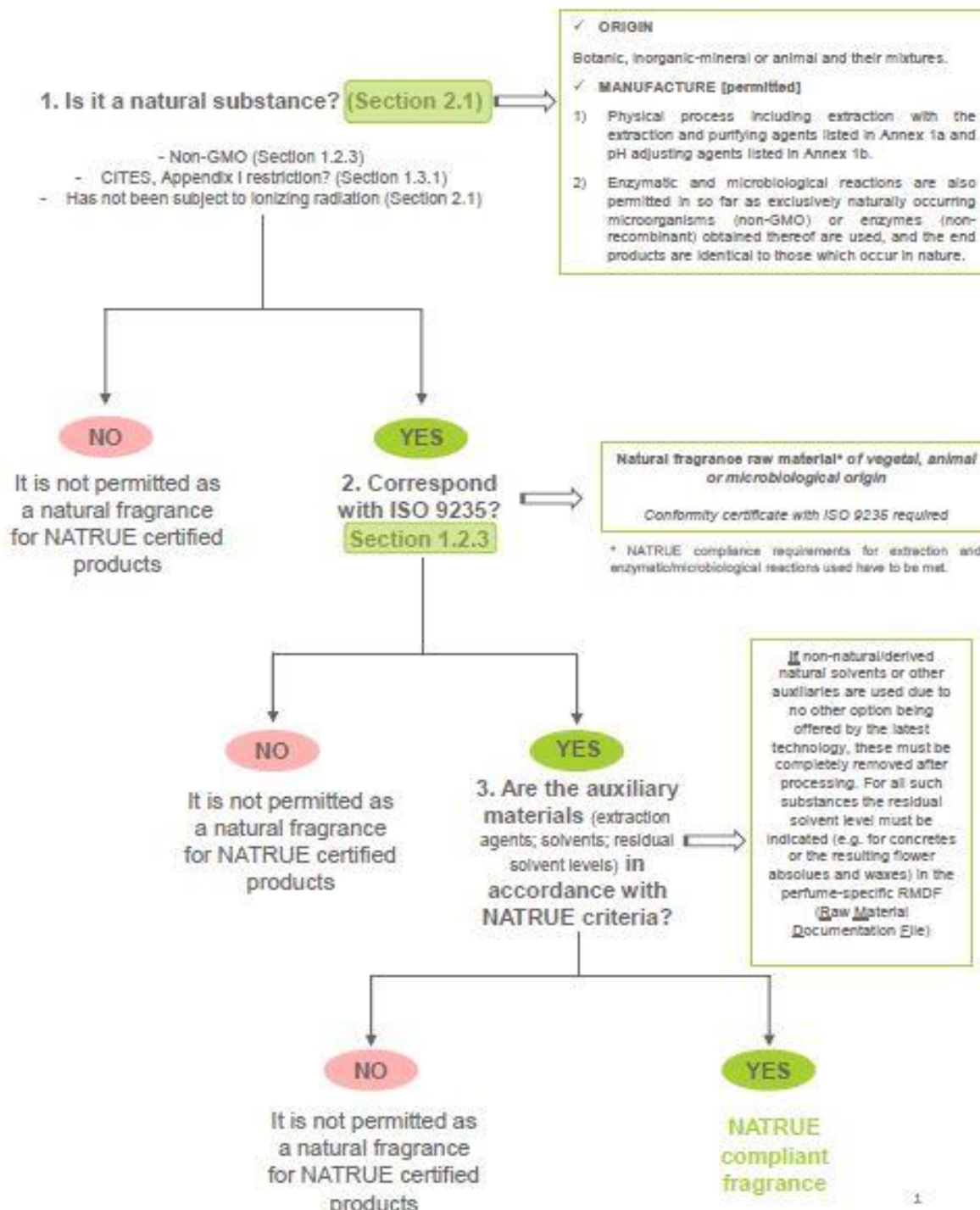
¹ This document will not be accepted if this information is missing



True Friends of
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NATRUE technical guidelines: Fragrances – Aromatic natural raw materials (1/3)

Step 1: Does the substance meet NATRUE requirements?





Step 2: How to fill the RMDF in the case of a fragrance for compliant use?

RMDF = Raw Material Documentation File

Although **perfumes** are a **special category** within the cosmetic products, **information must be provided** in order to assess their conformity with the NATRUE criteria.

The details below summarise the fundamental requirements. Please refer to the perfume-specific RMDF for further details, found [here](#).

Part 1: Identity of the substance

- ☐ **INCI name:** "parfum" or "aroma" for aromatic raw material (ISO 9235 conform) components
% portion of the aromatic raw material and all other components (natural, nature-identical or derived natural) of the fragrance raw material including all kinds of additives, e. g. solvents, carriers, excipients, preservatives, antioxidants etc. **must** be declared
- ☐ **Trade name, Producer, Supplier:** filled accordingly
- ☐ **Solvent Residues:** The residues (if any) **must** be listed (and evidential support/proof of the levels provided)
- ☐ **Non-GMO compliance:** **Must** declare in the RMDF **and** enclose certificate for compliance verification
- ☐ **No Ionizing radiation:** **Must** declare in the RMDF
- ☐ **Labelling notification:** **If** it contains any of the 26 ingredients according to Article 19(1)(g) of Regulation (EC) No 1223/2009 these **must** be listed.
- ☐ **Manufacturer's/Supplier's stamp, date and signature:** **Must** be filled in.

Part 2A: Natural substance (aromatic and non-aromatic raw materials)

- ☐ **INCI name:** Aromatic natural raw materials in natural fragrances corresponding NATRUE natural substances and to ISO standard 9235 may be used; **if** the formula is not disclosed these fall under the declaration 'parfum' or 'aroma'.

All other non-aromatic raw material components of the fragrance that are also permitted natural substances must be declared (e.g. solvents, carriers, excipients etc.)

- ☐ **Certified organic production:** **If** organic **must** enclose original organic certificate
- ☐ **Fragrance/essential oils:** **Must** conform to ISO 9235 and enclose certificate (example template [here](#))
- ☐ **Certificate of origin (CITES):** **Must** complete declaration requirement for starting material in RMDF
- ☐ **MANUFACTURING STEPS:**

NATRUE acknowledges that some fragrance formulas and/or manufacture for perfume raw materials may be subject to confidentiality. **Only** in such cases, as part of their conformity assessment with the NATRUE criteria, may it be acceptable to provide a separate signed and dated self-declaration covering:

- ☐ Compliance of all aromatic fragrance raw materials corresponding to only natural substances (physical extraction or biotechnologically produced), according to the latest version of the NATRUE criteria (available [here](#)).
- ☐ Please note that information for assessment on all other components in the fragrance are not covered by this self-declaration and **must** be provided. This includes, for example, where no other option offered by the latest technology to recover natural substances and non-natural solvents are used, then these solvents must be removed, and the solvent name and residual level must be declared.

2



Step 2: How to fill the RMDF in the case of a fragrance for compliant use?

RMDF = Raw Material Documentation File

Although **perfumes** are a **special category** within the cosmetic products, **information must be provided** in order to assess their conformity with the NATRUE criteria.

The details below summarise the fundamental requirements. Please refer to the perfume-specific RMDF for further details, found [here](#).

Part 2B: Nature-identical substance

Only to be completed as applicable and for nature-identical substances (References: Annex 2* and 4a*)

Part 2C: Derived natural substance

Only to be completed as applicable and for those substances in the fragrance that are **not** themselves aromatic raw materials. (Please note that only natural substances, according to their compliant origin and manufacture and which correspond to ISO 9235 norm, are permitted as aromatic raw materials).

All other components of the fragrance raw material including all kinds of additives, e. g. solvents, carriers, excipients, antioxidants etc. that are also derived natural substances (References: Annex 3* and 4b*) **must** be declared (origin and manufacture); **no** self-declaration is permitted.

* New INCI's not listed on Annex 2, 3 or 4 may be included by based upon confirmation of compliance by the NATRUE Scientific Committee as expressed in the Flow Chart here: [EN](#); [DE](#); [FR](#).

Attachment 6 – Declaration of Conformity with ISO 9235



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NATRUE
ISO 9235 declaration

ISO 9235 conformity declaration

In natural cosmetics, natural fragrances that comply to the requirements of the NATRUE-label criteria as natural substances (NATRUE standard: Section 2.1), and which correspond to ISO standard 9235 (NATRUE standard: Section 1.2.4) may be used.

VENDOR DECLARATION

Name, address of vendor:

Product trade name:

I declare that ingredients in this (fragrance) raw material correspond with ISO 9235:2013 - Aromatic natural raw materials – Vocabulary.

The undersigned takes responsibility for the accuracy of this declaration.

Country, place, date and signature of vendor¹

Company stamp of vendor
(if appropriate)

¹ This document will not be accepted if this information is missing

Attachment 7 – Declaration of Biodegradability - Tensioactive Substances**Biodegradability Declarations – Surfactant Substances
Conformity Declaration European Bylaws CE 648/2004**

In natural cosmetics, surfactant detergents substances that fulfill the requirements of IBD Natural Ingredients Guideline (item 1.3.6 Surfactant Detergents), that correspond to European Bylaws Norm CE 648/2004, can be utilized.

Producer Declaration

Manufacturer's name and address: _____

Product's name: _____

I declare that this raw material is completely biodegradable according to European Bylaws CE 648/2004:

- Primary aerobic biodegradability: minimal of 80% (OCDE method or ISO 11733 equivalent)
- Final aerobic biodegradability (mineralization): minimal of 60% in 28 days (ISO 14593 method)
- Anaerobic biodegradability: minimal of 60% final biodegradability (OCDE 311 method, ISO 11734 or equivalent).

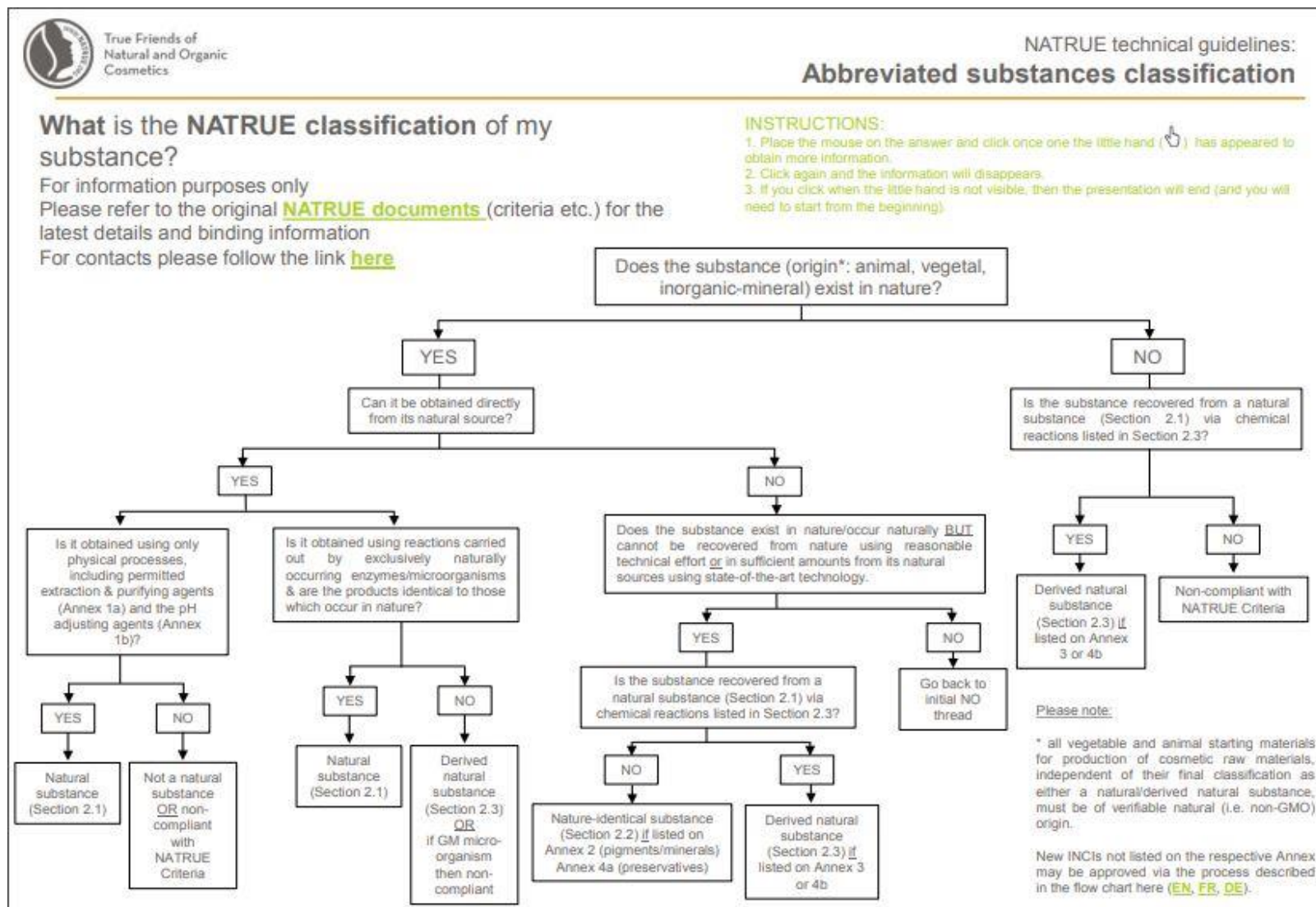
The declaring signer assumes the responsibility for this declaration accuracy.

Supplier's¹ country, local, date and signature:

Supplier's company stamp (if appropriated)

¹ The document won't be acceptable if this information is missing.

Attachment 8 - Guide for Classification of raw-materials



Attachment 9: Table 1 - Requirements for certification under the NATRUE standard, by category.

Minimum content of natural substances (%) (Green) and maximum content of derived natural substances (%) (Orange). Please note the following additional requirements laid out below.

	1***	2	3	4	5	6	7	8	9	10	11***	12#	13
Content of raw materials referred to the finished product (%)	Oils/water-free cleaning and skin care products	Parfums, Eaux de Parfum, Eaux de Toilette, Eaux de Cologne	Skin care emulsions (W/O) and Oleogels	Decorative cosmetics containing water	Deodorants and antiperspirants	Skin care emulsions (O/W) and gels	Sunscreens	Hair treatment products	Cleaning products containing surfactants	Oral care	Decorative cosmetics, water-free	Anhydrous soaps and skin cleansers	Waters
Natural Cosmetics (Level 1)	80	60	30	10	10	10	10	3	3	2	1	1	0.1
	20	10	30	30	30	25	55	40	85	70	50	99	10
Organic Cosmetics (Level 3)	90*	60*	30*	15*	15*	15*	15*	15*	15*	15*	15*	1*	15*
	10**	10**	20**	20**	15**	20**	30**	15**	25**	15**	15**	99**	5**

- No specific requirement or limitation on percentage content of nature-identical substances or water except where indicated
 * Content of substances from controlled organic farming in Section 3.3.
 ** Production of derived natural substances made of organic starting material.
 *** Water-free product contains up to 5% added water.
 # For products in category 12 (soaps and anhydrous skin cleansers containing surfactants) the minimum required organic content (respectively ≥95% of the content as in * and **) refers to the natural and derived portions to be added.

Important: From January 1, 2021, new IBD or NATRUE certified cosmetic products will be certified as “natural” or “organic”. Products already certified with the eliminated "natural with organic portion" certification can still be identified as such on the market and in the NATRUE database until the product certificate expires. After recertification, a product that meets the requirements of the “natural with organic portion” level will be recertified as “natural” or “organic”, according to the fulfillment of the requirements established for each category.

Attachment 10: Glossary

Organic Farming: An agricultural management system that seeks to conserve and balance the soil and other natural resources, maintaining the harmony of all the constituent elements of the system (water, soil, plants, animals, insects ...), including humans. Organic farming complies with strict certification standards that require, not only the elimination of pesticides, but also the conservation and preservation of natural resources, as well as adequate working conditions.

Certification: is a process wherein a certification agency guarantees product quality, in writing, through inspections that verify ingredient origins, facilities and production processes, product composition, storage and transportation processes, environmental conservation practices and working conditions. Certification aims to identify the product's origin, tracking the product from production to point of sale, and then to the final consumer, ensuring a differentiated product. Its main objective is to verify that the product offered to the consumer complies with the certifying agency regulatory standards for organic and natural products.

IBD: certification agency, which inspects and certifies ingredients, agriculture and livestock, and end products.

International Federation of Organic Agriculture Movements (IFOAM): International Federation that operates within the organic sector, stipulating policies and standards, and contributing to the dissemination of organics through various partnerships, including: international fairs and events. IFOAM accredits and audits certifying agencies of organic and natural products through its IFOAM ACCREDITATION program, run by the US-based International Organic Accreditation Service (IOAS).

INCI: is the abbreviation for INTERNATIONAL NOMENCLATURE OF COSMETIC INGREDIENTS. It is an international coding system, recognized and adopted worldwide, used to identify the ingredients used in cosmetic products. There are specific rules governing the definition of the substance "name", as well as an international committee made up of representatives from the Food and Drug Administration (FDA), the European Commission, the Canadian and Japanese Ministries of Health responsible for assigning nomenclatures.

NATRUE: is a Brussels-based international non-profit association committed to promoting and protecting natural and organic cosmetics worldwide.

IBD

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