

Guide to certification of cosmetics according to the NATRUE Standard

Natural and organic cosmetics are a growing industry. NATRUE is a rapidly developing, independent and internationally operating certification system for natural and organic cosmetics. NATRUE certification gives you the opportunity to boost your customers' confidence in your products. Certain customers have even made it a requirement for their suppliers.

A. Content of the standard

The following points reflect the priorities and objectives of the NATRUE Standard:

- Natural and/or organic ingredients only
- 'Soft' processing methods
- No petroleum-derived products (paraffins, -propyl-, -alkyl-, etc.)
- No silicone oils and derivatives
- No genetically modified ingredients
- No irradiation of end products or ingredients
- Products not tested on animals

At least 75% of a brand's entire product range must be certified to prevent companies from putting brands in the market of which only one single product is certified ("greenwashing").

The NATRUE Standard includes three levels of certification:

- Natural cosmetics
- Natural cosmetics with organic portion (at least 70% organic)
- Organic cosmetics (at least 95% organic)

Certification is possible for:

- Companies manufacturing natural and/or organic cosmetics and bringing them on the market under their own brand
- Manufacturers of raw materials for natural and/or organic cosmetics
- Companies manufacturing natural and/or organic cosmetics for third parties

The 75% rule (see above) does not apply to manufacturers of raw materials or companies manufacturing for third parties.

All the requirements pertaining to the NATRUE certification system can be found in the NATRUE standard and appendices, which are freely available on the Internet: <http://www.natrue.org/certification/>

This guide, which is intended for companies considering a move towards NATRUE certification, contains a systematic overview of the different steps in the certification procedure of TÜV NORD INTEGRA.

B. The different steps in the certification process

1. Request for quotation

Companies considering NATRUE certification may request an application form for a quotation from TÜV NORD INTEGRA.

If you wish to receive a quotation, you simply fill out this document and forward it to TÜV NORD INTEGRA. It will give us all the necessary information about your company (number of products; number of raw materials; number of staff; number of company locations, etc.) for preparing a quotation.

2. Quotation

TÜV NORD INTEGRA will send you a quotation containing the rates for the documentary audit and the on-site audit. Audits are held every 2 years.

Besides audit rates, the quotation includes the following costs:

- Travel expenses
- Amount for each certification decision
- Any translation costs with respect to certificates (if applied for)

TÜV NORD INTEGRA also sends you

- 2 copies of the agreement for NATRUE certification, i.e. the agreement between your company and TÜV NORD INTEGRA
- 2 copies of the document "Agreement on the usage of the NATRUE label", i.e. the agreement between your company and NATRUE aisbl.

3. Application for certification and agreements

If you agree to the quotation, you send a signed copy to TÜV NORD INTEGRA together with the two copies of the agreement with TÜV NORD INTEGRA, also signed by your company.

One copy of the agreement is signed by TÜV NORD INTEGRA and returned to you. The signed quotation and agreement are valid for a period of two years.

You send the 2 copies of the document "Agreement on the usage of the NATRUE label" to NATRUE aisbl, MAI-Maisons des Associations, 40 Rue Washington, 1050 Brussels. NATRUE will return a copy duly signed by them to your office.

4. Documentary audit

The first step entails the documentary audit. Companies must submit the following data:

- In a standardised document, the detailed formulae of the products submitted for NATRUE certification, as well as the raw materials specifications to allow for determining conformity – or nonconformity – to the NATRUE Standard.
- The date on which the products are intended to be brought on the market under certification
- Information about the production site
- Countries where the products will be marketed
- A list of all the cosmetics of a certain brand and their intended status (natural; natural with organic portion; organic, or conventional) to allow for determination of compliance with the 75% rule.

The auditor will examine the documentation and check the extent of conformity of the raw materials and formulae with the NATRUE Standard and subsequently determine the certification level applicable for the products: natural; natural with organic portion; organic. The auditor will request additional information if necessary.

5. Result of the documentary audit

If the documentary audit proves that the product formulae submitted for certification comply with the NATRUE Standard, TÜV NORD INTEGRA will prepare a temporary certificate for the products involved. Only after receipt of that certificate shall the company be entitled to roll out products bearing the registered NATRUE logo.

6. Audit on site

The audit on site shall be held on the company premises no more than three months after issuance of the temporary certificate.

The audit on site always includes the following steps:

- Opening meeting
- Document audit (e.g. formulae, raw materials specifications, logo use, packaging materials)
- Inspection tour of the company (inspection of infrastructure and installations, manufacturing methods, cleaning installations and detergents) (important: the audit must take place during production) to establish concordance of the certified products with the submitted formulae
- Traceability check (mass balance raw materials - end product)
- Processing of the audit data by the auditor
- Closing meeting to discuss any nonconformities and further steps to be taken by you

After the audit, the auditor will hand you an audit report containing all the nonconformities as well as a timeline for solving them.

7. Solving nonconformities

You are required to submit proposed corrective measures for the established nonconformities within 21 days after the audit.

The auditor will assess the information forwarded by you. Where necessary, the auditor will ask you to provide additional information. If the auditor approves the corrective measures you have forwarded, the report is completed and delivered to the responsible person at TÜV NORD INTEGRA.

8. Follow-up audit

If a large number of nonconformities is established, it may be necessary to assess corrective measures on site during a follow-up audit. The extensiveness of this audit depends on the number of nonconformities.

9. Certification decision

Based on the audit report TÜV NORD INTEGRA decides whether or not to grant a certificate to your company.

10. Invoicing

After every completed audit (documentary audit or audit on site), an invoice will be sent out for the number of man-days performed and any additional costs, in accordance with the quotation.

Companies are also required to pay NATRUE a "NATRUE label fee". NATRUE will invoice this fee after issuing a temporary certificate.

A (temporary or final) certificate cannot be issued until all the invoices have been paid.

11. Certificate

Once all the above requirements have been met, a final certificate will be issued. Certificates are valid for a period of two years.

12. Re-certification audits

A recertification audit will take place every two years and, in principle, no later than two years after the previous audit. The purpose of the recertification audit is to determine the extent of compliance of the company's existing system and any adaptations with the requirements. In this context, special attention is paid to the correct follow-up of any nonconformities that were established during the previous audit.

A new certificate will be issued after the company has resolved any nonconformities established during the recertification audit.

13. New products or changes in formulae

Companies wishing to roll out *new products* bearing the NATRUE logo in between two audits are required to submit to TÜV NORD INTEGRA all the data (supra, article 4, sub 1) of the products involved. TÜV NORD INTEGRA will evaluate the data as follows:

- if the new products are offered for certification in the year of the audit on site, a documentary assessment suffices;
- if the new products are offered for certification in the following year, a new audit on site is required.

If the new products comply with the NATRUE criteria, a certificate will be issued and the costs related to assessing the new products invoiced.

Companies are required to inform TÜV NORD INTEGRA of any and all *changes in formulae*. Depending on their importance and quantity, TÜV NORD INTEGRA may invoice the costs for assessment of the changes.

14. Appeal and complaints

If you disagree with the decision of TÜV NORD INTEGRA, you may appeal by sending a substantiated written appeal to TÜV NORD INTEGRA by registered mail. The procedure to be followed in this case can be found in your agreement with TÜV NORD INTEGRA.

Substantiated complaints about audits, decisions, or other steps in the certification process must be delivered in writing within one month after delivery of a report or decision. The complaint procedure followed by TÜV NORD INTEGRA will be sent to you upon request.

15. Communication to NATRUE

TÜV NORD INTEGRA shall inform NATRUE of the company's certification status and enter the certified products into a publicly accessible database.