

COSMOS-standard

cosmetics organic and natural standard

European cosmetics standards working group

CONSULTATION DRAFT — 3rd November 2008

Green = Consultation points

1. Introduction

These Standards have been developed at the international level by ICEA (Italy), BDIH (Germany), Bioforum (Belgium), Cosmebio/Ecocert (France) and Soil Association (UK) in order to define minimum requirements and definitions for organic and/or natural cosmetics.

1.1 Main objectives of COSMOS-standard

Addressing the excesses and failures of current developments is a key challenge for our society. Establishing a "sustainable development" that would reconcile economic progress, social responsibility and maintain the natural balance of the planet is a project in which the cosmetics sector is willing to be fully involved. The application of the principles of sustainable development in economic activity implies however changing patterns of production and changing consumption practices. Recognising these challenges, the responsibility of its actors, the organic and natural cosmetics sector clearly shows its ambition to go further in sustainable development with the setting at the European (and international) level of a new standard for organic and natural cosmetics.

To stimulate processes for sustainable production and consumption, the organic and natural cosmetics sector is using some simple rules governed by the principles of prevention and safety at all levels of the chain from production of raw materials to the distribution of finished products.

These rules are:

- promoting the use of products from organic agriculture, and respecting biodiversity;
- using natural resources responsibly, and respecting the environment;
- using processing and manufacturing that are clean and respectful of human health and environment;
- Integrating and developing the concept of "Green Chemistry" instead of petrochemicals.

This last point, new aspect of the COSMOS-standard is a key to the success of this ambition considering the specificities and constraints of the formulation of cosmetic products (particularly versus food products).

With this "green philosophy" and this desire to actively contribute to sustainable development, the cosmetics sector is committed to define and implement a standard for organic and natural cosmetics. This standard takes into account the current technological reality while infusing a dynamism that will lead to innovative developments.

To facilitate the translation of these rules at the level of a standard, it is necessary to distinguish the five categories of ingredients contained in a cosmetic product (listed below in ascending order of human intervention):

1. water – vital and basic raw material in product development; its quality is essential;

2. mineral ingredients – interesting and necessary, but not renewable; they require clear environmental rules in their use;
3. physically processed agro-ingredients – already benefit from a satisfactory European standard on organic agriculture;
4. chemically processed agro-ingredients – certifiable by imposing agricultural organic raw materials and manufacturing processes that are clean and authorised, all under the umbrella of “Green Chemistry”;
5. synthetic materials – this is the category to actively manage the transition from the current situation to the objectives and direction of this standard.

This new COSMOS-standard's ultimate objective is to address the major issues essential to the environment and welfare of man on the planet. For practical purposes, it aims to ensure the transition between today's and tomorrow's possibilities of technological advances to promote the development of cosmetics ever more natural and organic. This is necessary for the respect of consumers who must be informed clearly and transparently so that they can themselves be an actor for sustainable development.

1.2 Copyright

These standards are the property of the above named founding organisations and shall not be copied, reproduced or otherwise used except with their express written permission.

2. Regulations

You are expected to comply with all relevant legislation, including The EU REGULATION for COSMETIC PRODUCTS - European Directive 76/768/EEC as amended, and other local or national laws where appropriate.

3. Scope

These Standards apply to cosmetic products marketed as organic or natural. They cover:

- origin and processing of ingredients
- manufacturing
- traceability
- (packaging)
- labelling
- marketing claims
- (environmental management).

4. Definitions

In the context of these standards, the definitions below will apply.

« Agro-ingredient » - any plant, animal or microbial product derived from agriculture, aquaculture or wild collection/harvest.

Chemically processed » - processed or extracted using chemical processes such as those listed in Appendix II.B (which are those we allow) and Appendix II.C (which are those we do not allow).

« Contaminant » - a substance that is:

- not naturally present in the material, or
- present in quantities greater than those that exist naturally which could lead to pollution (persistence, residues) and toxicity risks.

Contaminants may be:

- heavy metals
- hydrocarbons
- pesticides
- dioxins
- radioactivity
- GMOs
- mycotoxins
- medicinal residues
- nitrates
- nitrosamines.

« Cosmetic product » - Directive 76/768/EEC defines cosmetic products as:

“any substance or preparation intended for contact with:

- *the various external parts of the human body (epidermis, hair system, nails, lips and external genital organs), or*
- *the teeth and the mucous membranes of the oral cavity*

with a view exclusively or mainly to:

- *cleaning them,*
- *perfuming them,*
- *changing their appearance*
- *correcting body odours*
- *protecting them*
- *keeping them in good condition.”*

Note – you can find an indicative list of product types performing these functions in Annex I of Directive 76/768/EEC.

« Ingredient » - (taken from Article 5a and 6 of Directive 76/768/EEC) cosmetic ingredient shall mean any chemical substance or preparation of synthetic or natural origin used in the composition of cosmetic products.

The following shall not be regarded as ingredients:

- impurities in the raw materials used,
- subsidiary technical materials used in the preparation but not present in the final product,
- materials used in strictly necessary quantities as solvents or as carriers for perfume and aromatic compositions.

Note - The water added during the manufacture of the finished product is therefore a separate ingredient.

« Moiety » - a specific segment of a molecule.

« Manufacturing » - group of operations carried out in the factory or the laboratory, for obtaining, preparing, processing and labelling products.

« Mineral » - raw materials obtained from naturally occurring substances formed through geological processes, but excluding fossil fuel-derived materials.

« Organic » - production system that complies with Regulation n° (EC) 834/2007 or other recognised international or national organic standards and certified by an IFOAM accredited or internationally recognised (according to ISO 65) certifier. When referring to organic in these standards other terms that mean the same in other languages are also included and are subject to the same limitations.

Note - Minerals are not within the scope of Regulation (EC) 834/2007.

The water added during manufacturing is not organic (but see standard 5.3 below for how to calculate the proportion of organic materials it may contain).

« Physically processed » - processed or extracted using physical processes such as those listed in Appendix I.A (which are those we allow).

« Synthetic » - anything not derived from agriculture, aquaculture, wild collection/harvest, minerals or water.

5. General

5.1 Precautionary principle

When there is scientific evidence that an ingredient, technology or process could pose a health or environmental risk, then we will apply the precautionary principle and will not allow it. For this reason, we do not allow:

5.1.1. Nanoparticles

Manufactured insoluble nanoparticles – defined as particle size of less than 100nm are forbidden.

5.1.2. Genetically modified organisms (GMOs)

GMOs and derivatives of GMOs, including contamination, in ingredients are forbidden above the reliable detection limit of 0.1%.

5.1.3. Irradiation

Gamma and X-ray irradiation are forbidden.

5.2 Animal testing

You must not test raw materials, ingredients or products on animals except where required by law.

5.3 Exceptions

Exceptions and the time limits until when they are allowed are listed in Appendix III.

6. Ingredients and composition of the finished product

6.1 Ingredient categories

We have classified all ingredients in five main categories:

- Water
- Minerals
- Physically processed agro-ingredients
- Chemically processed agro-ingredients
- Synthetic ingredients.

6.2.1 Water

The water you use must comply with hygienic standards (CFU less than 10/litre) and may be:

- potable water
- spring water
- water obtained by osmosis
- distilled water
- sea water.

Water may be filtered or softened.

6.2.2 Mineral ingredients and ingredients of mineral origin

You may only use:

- pure, natural minerals that are only treated by:
 - washing

- steam cleaning
- ultra heat treatment
- other mechanical cleaning methods, and
- drying

and preferably from environmentally sound extraction processes; and

- those ingredients of mineral origin that are listed in Appendix II.B and comply with relevant legislation.

6.2.3 Physically processed agro-ingredients

Included is any physically processed product of plant, animal, or microbial origin that can be certified as organic and that comply with the conditions below.

You must:

- only use raw materials of plant, animal or microbial origin that have been extracted using the physical processes listed in Appendix I.A.

You must **not**:

- use plant raw materials that are part of the European and international lists of protected species (cf. the Washington Convention or the Berne Convention)
- use plants or plant materials that have been genetically modified
- use raw materials extracted from living or slaughtered animals.

You may use ingredients of animal origin as long as:

- they are produced by animals but are not a part of the animal
- they have been obtained using only the processes in Appendix I.A or B, and
- the animals are not part of the European or international lists of protected species (these are listed in the Washington Convention or the Berne Convention).

You should ensure that the animal products you use come from animals whose welfare has been protected.

6.2.4 Chemically processed agro-ingredients

Chemical processes must follow the principles of green chemistry (Environmental Protection Agency Green Chemistry Programme, USA, 1998):

Principle	Requirement	How verified	Exception
1. Atom economy - high yield	Minimum 50% yield (E = mass of products / mass of waste)	Declaration of supplier	
2. Energy economy (low energy use)	Information point – you must provide information about this	Information from supplier	
3. Use of alternative catalysts	No petrochemical catalysts or those that result in heavy metal contamination of the product	Declaration of supplier	
4. Use of renewable resources	All raw materials must comply with 6.2.3 and 6.2.2		Petrochemical and other moieties can be used but these must comply with the synthetic percentage limitations
5. Absence of temporary modification (intermediary	Information point – you must provide information about this	Information from supplier	

reactions)			
6. Method of analysis (eg real time analysis)	Information point – you must provide information about this	Information from supplier	
7. Lower waste production	Information point – you must provide information about this	Information from supplier	
8. Non-persistent products	Chemically processed ingredients must be easily biodegradable according to OECD 302 series (more than 90% in 28 days)		
9. Less hazardous chemical synthesis	Chemically processed ingredients must be made using only reactions listed in Appendix I.B		Exceptions are listed in Appendix III
10. Products more efficient and safer	Chemically processed ingredients must comply with aquatic toxicity of Daphnia EC ₅₀ (48 h) > 100 mg/l		
11. Green reagents	No synthetic solvents		
12. Limitation of accident risk	Information point – you must provide information about this	Information from supplier	

However, we recognise that green chemistry is still in development and needs further elaboration. As the principles and practice of green chemistry evolve, we will elaborate and incorporate them further into these standards.

You may use ingredients derived from culture or fermentation and other non-GMO biotechnology: The cultures must use only feedstock from natural vegetable or microbial raw materials without using genetically modified organisms or their by-products.

6.2.5 Synthetic ingredients

As a temporary exception, we allow certain synthetic ingredients as long as there are no effective natural alternatives available to ensure the safety of consumers or stability of the product. You must only use those we list in Appendix II.A.

For example, you must not use the following ingredients of synthetic origin:

- synthetic dyes
- synthetic perfumes
- synthetic anti-oxidants
- synthetic emollients
- synthetic oils and fats
- synthetic silicones
- synthetic UVA and UVB filters.

6.3 Rules for composition

6.3.1 All products:

- must contain no more than 5% of synthetic ingredients: only those listed in Appendix II.A, and those chemical moieties used to produce chemically processed agro-ingredients.

6.3.2 For products under organic certification:

- at least 20% of the total product must be organic (aim to get to 50% by 2020, subject to consultation).
- at least 95% of the physically processed agro-ingredients must be organically produced, the remaining physically processed agro-ingredients must be organic if they are available (in sufficient quantity and quality)
- by 24 months after these standards come into force at least 30% of the chemically processed agro-ingredients must be of organic origin (aim to get to 50% by 2015, subject to consultation).

6.3.3 For products under natural certification:

- there is no requirement to use organic ingredients (however, see 9.2 for requirements for how you can identify organic ingredients on the product labels).

6.4 Rules for calculation

6.4.1 For physically processed agro-ingredients, the calculation of the organic percentage is:

- Extraction without residual solvents (eg CO₂ or pressure):
organic percentage = 100%
- Extraction with organic residual solvents (eg organic alcohol or organic glycerin,):
organic percentage = 100%
- Extraction with partially organic or non organic residual solvents (eg hydrolates):
organic percentage = (organic fresh raw materials + organic solvents) / (organic fresh raw materials + organic and non-organic solvents used) x 100.

- the final percentage cannot exceed 100%

- 1 part dried plant (according to Codex definition) = 4 parts fresh plant

Note – only in the calculation of extracts

o the same calculation applies to ingredients that have been reconstituted after drying.

Consultation point – are these acceptable criteria for calculating extracts?

6.4.2 In chemically processed agro-ingredients, you must calculate the organic percentage of that ingredient as the proportion (by weight) of the organic raw materials in that ingredient, taking into account the chemical reagents used to make that ingredient:

Moiety of the final ingredient coming from organic origin / (total weight of final ingredient) x 100.

6.4.3 Water cannot be calculated as organic.

Included is water that is:

- added directly, or
- added indirectly as mixtures with or components of other ingredients, for example minerals, physically or chemically processed ingredients.

The liquid (juice) content of fresh plants is not considered as water. Please refer to 6.4.1 above for extracts and reconstitution of dried or concentrated ingredients.

6.4.4 Minerals cannot be calculated as organic.

6.4.5 Calculation of synthetic ingredients

The calculation of synthetic ingredients in the finished product includes:

- the total of all the synthetic ingredients of the formula
- the total moieties of synthetic origin in chemically processed agro-ingredients.

7. Storage, Manufacturing and Packaging

7.1 Storage

You must clearly label your storage areas to avoid any confusion or risk to the integrity of your products

7.2 Manufacturing

You must separate different manufacturing processes to prevent contamination of your organic or natural ingredients.

You must have a Quality Control System which includes:

- complete traceability of ingredients and final products
- manufacturing procedures throughout all stages
- ingredient and product testing, and
- analysis, manufacturing and storage records.

7.3 Manufacturing processes

Your manufacturing processes must comply with Appendix I.

7.4 Packaging

Consultation point - we wish to consider introducing further standards for packaging. This may include further restrictions on what we allow and other materials we do not allow. What should these be?

7.4.1 To minimise the direct and indirect environmental impacts of your packaging during its life cycle, you must:

- minimise the amount of material used
- maximise the amount of material that can be reused or recycled, and
- use materials with recycled content where possible.

You must be able to demonstrate, at your inspection, that you have done this for each packaging format you use. You may use a form from us to help you do this. Please contact us for copies and guidance.

7.4.2 You must review your packaging against standard 7.4.1 at least every three years and be able to demonstrate that you have done this, for example by keeping minutes of review meetings, or having a formal policy requiring this.

7.4.3 You must **not** use these materials in your packaging:

- polyvinyl chloride (PVC)
Note – you may use other chlorinated plastics, such as PVdC
- materials or substances that contain, have been derived from, or manufactured using, genetically modified organisms or genetically engineered enzymes
- polystyrene foam.

You must be able to prove to us that you have not used these materials, for example by having written confirmation from your supplier.

7.4.4 You must ensure that any environmental information, claims and symbols on your packaging are clear, truthful and accurate.

7.4.5 You must only use the following propulsive gasses:

- air

- oxygen
- nitrogen
- carbon dioxide
- argon.

8. Environmental management

8.1 Environmental management plan

You must put in place an environmental management plan which addresses the whole manufacturing process and all the residual products and waste resulting from this. You must implement this effectively.

As part of the environmental management plan, you must put in place a waste management plan which addresses your manufacturing waste, including gaseous, liquid and solid waste. Your waste management plan must aim to reduce, reuse, recycle waste products on an efficient and rational basis.

Note - If you already comply with ISO 14000 or national legislation that already covers this, we will accept this.

You must regularly:

- sort your cardboard, glass, paper and all other waste materials
- recycle or process this waste, and
- send all your other waste to a specialized recycling firm which deals with specific packaging that you cannot recycle.

You should conduct a carbon audit of your operation.

Consultation point – should we include this, as a recommended practice, or even as mandatory?

8.2 Cleaning and hygiene

You must use cleaning materials in which the ingredients comply with these standards.

In addition, you may use the following disinfection materials: vegetable derived alcohol, iso-propyl alcohol, amphoteric surfactants, hydrogen peroxide, mineral acids and alkalis and any other ingredients listed as accepted in these standards.

Consultation point – what other products for cleaning and hygiene are necessary? Please provide justification.

Note – We may develop additional standards for cleaning products.

9. Labelling & communication

9.1 For products under organic certification

- You must label the product with the term 'COSMOS-ORGANIC' or the 'COSMOS-ORGANIC' logo.
- You must indicate the body responsible for certification or control of the last process in manufacture of the product by its name, code or logo.
- You must indicate the percentage of organic origin ingredients by weight in the total product, as "x% organic of total".
- You may indicate organic ingredients only in the INCI list. This must be limited to the wording: "from organic agriculture" or similar expression using the same typing as used for the INCI list.
- You may also indicate the percentage of organic origin ingredients by weight in the total product without water, but it must be clear what this percentage refers to.

- You may also indicate the percentage of organic origin ingredients by weight in the total product without water and minerals, but it must be clear what this percentage refers to.

You cannot use the term organic in the product name unless the product is at least 95%? or 100%? organic, measured as a percent of the total product.

Consultation point – should this be 95% or 100%?

9.2 For products under natural certification

- You must label the product with the term 'COSMOS-N|ATURAL' or the 'COSMOS-NATURAL' logo.
- You must indicate the body responsible for certification or control of the last process in the manufacture of the product by its name, code or logo.
- You may indicate organic ingredients only in the INCI list. This must be limited to the wording: "from organic agriculture" or similar expression using the same typing as used for the INCI list.
- You may indicate the percentage of organic origin ingredients by weight in the total product, as "x% organic of total".
- You may also indicate the percentage of organic origin ingredients by weight in the total product without water, but it must be clear what this percentage refers to.
- You may also indicate the percentage of organic origin ingredients by weight in the total product without water and minerals, but it must be clear what this percentage refers to.
- You must not make any claim relating to organic on the front of the label.

Consultation point – should we allow a reference to organic ingredients outside the INCI list on the front of pack (with indication of organic percentage) for products under natural certification?

9.3 Supporting literature

If you make any reference to your organic or natural products or ingredients in advertising or supporting literature you must comply with the appropriate rules in 9.1 or 9.2.

9.4 Organic in the name of a company or product range

If your company name or product range includes the word organic, your use of that name or branding in conjunction with certified products must not be such that it might mislead the consumer.

9.5 Use of the name or logo of this standard

You must use the COSMOS-standard logos, terms or name in literature, advertising, publicity, etc:

- only in conjunction with your company name or brand if all the products in your company or brand are certified (for example, you can only state "we are COSMOS-ORGANIC certified" if the whole of the company's range is COSMOS-ORGANIC certified)
- only in conjunction with the products that are certified, and
- only in a way that does not mislead the consumer, for example where it might mistakenly be associated with non-certified products.

Note – the danger of such a mistake arises in particular if you use the name or logo on documents that are connected with the marketing of any non-certified products without a clear statement explaining the situation.

10. Inspection system

10.1. Inspection and certification

To label your products as natural or organic according to these standards, you must:

- have subjected your manufacturing operation and your products to inspection and certification by an authorised inspection/certification body; this includes any sub-contracted manufacturing plants that you use to process your products
- hold a valid operational certificate from that body
- undergo an on-site annual inspection cycle which may include possible unannounced inspections and other additional inspections, and

- allow the inspection/certification body to take samples and carry out analysis (according to standard procedures) for ingredients or contaminants either on a random basis or in case of suspicion.

10.2 Inspection/certification bodies

Bodies inspecting/certifying to these standards must:

- be accredited to ISO 65
- have cosmetics inspection/certification in the scope of their ISO 65 accreditation (or at least have applied for inclusion of cosmetics in the scope which must be granted within 18 months)
- be authorised by the process set up by the European cosmetics standards working group
- to inspect/certify to these standards
- submit to ongoing authorisation by the process set up the European cosmetics standards working group including any investigations they may undertake in case of complaint or suspicion, and
- cooperate with other authorised inspection/certification bodies to ensure common interpretation and implementation of these standards.

11. Use of these standards

These standards come into force on 30th March 2009.

Operators that are members of or are certified by one of the founders must comply with these standards as a minimum for all their certified products by at least 1st January 2011. Until 1st January 2011 these operators may:

- refer to the fact they are working towards these standards, and
- use the COSMOS-standard terms or logos according to these standards for the compliant products.

Other certification/inspection bodies that are not one of the founders must apply to use these standards following the procedure for application and authorisation. Once authorised, their operators may use the COSMOS-standard terms or logos according to these standards when they comply.

Appendix I

PROCESSING AGRO-INGREDIENTS

We have used the following criteria to select these processes:

- processes which allow the formation of biodegradable molecules;
- processes which respect natural active substances that are present in ingredients;
- processes which encourage good waste management and energy use and take into account ecological balance.

A. Physical processes that we allow

All EXTRACTIONS must be with natural materials with any forms of water or with a third solvent of plant origin, such as:

- ethyl alcohol
- glycerine
- vegetable oils
- CO₂ ABSORPTION (on an inert support that conforms to these standards)

BLEACHING - DEODORISATION (on an inert support conforming to these standards)

GRINDING

CENTRIFUGING (solid / liquid separation, spin-drying)

SETTLING AND DECANTING

DESICCATION - DRYING (progressive or not by evaporation / natural under sun)

DETERPENATION (if fractionated distillation with steam)

DISTILLATION, EXPRESSION or EXTRACTION (steam)

FILTRATION and PURIFICATION (ultra filtration, dialysis, crystallisation, *ion exchange*)

LYOPHILIZATION

BLENDING

PERCOLATION

COLD PRESSURE

HOT PRESSURE (depending on the fluidity of the fatty acids to be extracted)

STERILIZATION WITH THERMAL TREATMENTS (according to a temperature respectful of the active substances)

SIFTING

MACERATION

ULTRASOUND

B. Chemical processes that we allow

ALKYLATION

AMIDATION

CALCINATION of plants residues

CARBONIZATION (resins, fatty organic oils)

CONDENSATION / ADDITION

ESTERIFICATION

ETHERIFICATION

FERMENTATION (natural / biotechnological)

HYDRATATION

HYDROGENATION

HYDROLYSIS

NEUTRALIZATION (to obtain Na, Ca, Mg, K salts)

OXYDIZATION / REDUCTION

PROCESSES FOR THE MANUFACTURE OF AMPHOTERICIS

SAPONIFICATION

SULPHATION – *consultation point: this would allow sodium lauryl sulphate – is this acceptable or should SLS be specifically prohibited?*

ROASTING

NB: We have not mentioned here all the different modalities (catalysts, solvents, ...) that are necessary for certain processes. However, we wish to remind you that these must also comply with the criteria mentioned above.

C. Processes we do not allow

We do not allow any other processes besides those we list in A and B above. Those below represent a non-exhaustive list which only identifies the main ones.

BLEACHING - DEODOURISATION (on a support of animal origin)

USE OF ENZYMES DERIVED FROM GMOS

DETERPENATION (other than with beam)

ETHOXYLATION

IRRADIATION

SULPHONATION (as main reaction)

TECHNIQUES USING GENETIC ENGINEERING

TREATMENTS WITH ETHYLENE OXIDE

TREATMENTS USING MERCURY (MERCURIAL SODA)

USE OF PETROCHEMICAL SOLVENTS (HEXANE, TOLUENE, BENZENE, etc)

PROPOXYLATION

Appendix II

OTHER SUBSTANCES WE ALLOW

You may use these substances only as we identify below.

A – Synthetic ingredients

You may use these in both ingredients and the finished product.

<i>Ingredient</i>
Benzoic acid and its salts
Benzyl alcohol
Dehydroacetic acid and its salts
Denatonium Benzoate (where required by law)
Heliotropine
Salicylic acid and its salts
Sorbic acid and its salts
Tetra sodium glutamate diacetate

B – Ingredients of mineral origin

You may use these substances:

- for the specific uses listed
- or for general purposes if no specific uses are listed.

<i>Substance</i>	<i>Specific use</i>
Aluminium ammonium sulphate	
Aluminium CI 77000	Non-organic pigment / colourant
Aluminium hydroxide	
Aluminium oxide	
Aluminium sulphate	
Ammonium manganese diphosphate CI 77742	Non-organic pigment / colourant
Ammonium sulphate	
Bentonite	
Bismuth oxychloride CI 77163	Non-organic pigment / colourant (but must not be used in lip products)
Calcium carbonate CI 77220	Abrasive / buffer / opacifier
Calcium fluoride	Reagent for product for the oral cavity hygiene
Calcium sulphate (Gypsum)	Abrasive / opacifier
Cerium oxide	
Chromium oxides CI 77289, 77288	Non-organic pigment / colourant
Copper CI 77400	Non-organic pigment / colourant
Copper oxide	Active reagent
Copper sulphate	Additive
Cupric sulphate	Additive
Dicalcium phosphate dihydrate	Abrasive reagent / reagent for product for the oral cavity hygiene
Disodium phosphate	Buffer reagent
Hectorite	
Hydrated Silica	Abrasive reagent / absorbant reagent / opacifier / reagent for viscosity inspection
Iron hydroxide	Additive
Iron oxides CI 77480, 77491, 77492, 77499	Additive
Iron sulphate	Additive
Kaolin	

Lazzurite CI 77007	Non-organic pigment / colourant
Magnesium aluminium silicate	
Magnesium carbonate CI 77713 (Magnesite)	Absorbant reagent / viscosity reagent
Magnesium chloride	Additive
Magnesium hydroxide	Absorbant / buffer reagent
Magnesium oxide CI 77711	Absorbant reagent / buffer reagent / opacifier
Magnesium silicate	
Magnesium sulphate	Reagent for viscosity inspection
Malachite	
Manganese bis orthophosphate CI 77745	Non-organic pigment / colourant
Manganese sulphate	Additive
Maris sal (sea salt)	
Mica (muscovite) natural CI 77019	
Potassium carbonate	Buffer reagent
Potassium chloride	
Potassium hydroxide	Buffer reagent
Potassium iodide	
Potassium sulphate	Viscosity reagent
Prussian Blue CI 77510	Non-organic pigment / colourant
Silver chloride	Additive
Silver CI 77820	Additive
Silver citrate	
Silver sulphate	Non-organic pigment / colourant
Sodium bicarbonate	Buffer reagent
Sodium borate	Buffer reagent
Sodium carbonate	Buffer reagent
Sodium chloride	
Sodium fluoride	Reagent for product for the oral cavity hygiene
Sodium hydroxide (soda)	Buffer reagent
Sodium magnesium silicate	
Sodium metasilicate	
Sodium monofluorophosphate	Reagent for product for the oral cavity hygiene
Sodium silicate	Buffer reagent
Sodium sulphate	Reagent for viscosity inspection
Solum diatomea (diatomaceous earth)	
Talc CI 77718	
Titanium dioxide CI 77891	Non-organic pigment / colourant / opacifier
Zinc oxide CI 77947	Non-organic pigment / colourant / additive
Zinc sulphate	Antimicrobial reagent / reagent for product for the oral cavity hygiene

Consultation point – should we allow fluoride compounds in toothpastes?

Appendix III

EXCEPTIONS

Article	Exception	Time limit
6.2.1	Cochineal	2012 <i>Consultation point – for how long should we allow Cochineal</i>
6.2.1	Hexane extracted natural tocopherol	?? <i>Consultation point – which time limit?</i>
5.4	Gamma irradiation of clay types, kaolin and hectorite (Magnesium Aluminum Silicate), bentonite types, diatomaceous earth for the purpose of sterilisation	<i>Consultation point – which time limit? No irradiation means that stronger preservatives have to be used, but irradiation may affect the structure of the mineral.</i>

Appendix IV

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