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Statement on ISO 16128

For a long time cosmetics consumers have requested more clarity and transparency about the natural and organic claims on the cosmetics they buy. As companies know, these claims help sell more products because people believe those products will be better for them, their families and the environment.

Why is transparency so important? Because of the huge gap between consumers' expectations and the reality, which this has created a damaging lack of trust – trying to choose a trustworthy cosmetic product is a nightmare for those who aren't experts.

For this reason, COSMOS and its members, the main associations dedicated natural and organic cosmetics, have worked on and succeeded in harmonizing standards detailing the best accepted definitions, ingredients, processes and criteria, and also what should be excluded.

But suddenly, another initiative (ISO 16128), inspired from and driven by the conventional cosmetic industry, emerged with the main target: "to encourage a wider choice of natural and organic ingredients ... to encourage innovation". Will this aid transparency for consumers, as well as innovation?

What is ISO 16128?

ISO is the International Organization for Standardization, based in Geneva. It was established in 1947 by several national standard institutes (BSI in the UK, AFNOR in France, ASA in the USA) to harmonize and publish technical standards (mechanical equipment, product testing, etc). It has now 162 members out of the 206 countries in the world.

The cosmetic industry started to have its own Technical Committee back in 2000, ISO TC 217. It has 7 working groups covering different areas like microbiology, sun protection, etc and itself has published 24 standards.

In 2008, under pressure from European consumer associations, the European Commission decided to start work on the definition of natural and organic cosmetics. They chose to help them Cosmetics Europe, the European association of the conventional cosmetic industry.

Cosmetics Europe suggested it was a good idea to launch an ISO working group in order to get immediately an international dimension. The idea was to have a guideline on natural and organic cosmetics, which the conventional cosmetics industry could use to legitimise natural and organic claims on products (in line with the general European directive on claims). A first draft was provided by a group of Cosmetics Europe members. Some round tables were organized with leading natural and organic cosmetics associations and a project call was launched at the ISO level.

ISO TC 217 WG 4 was created and the name of the future standard was entitled ISO 16128: GUIDELINES ON TECHNICAL DEFINITIONS AND CRITERIA FOR NATURAL & ORGANIC COSMETIC INGREDIENTS AND PRODUCTS.

Why did COSMOS get involved?

As COSMOS, we decided to participate in this project because the first draft had been conceived and written by non-experts of the natural and organic cosmetic sector. We realised it was too far away from the common understanding of natural and organic. We were also convinced that sharing our ideas and experience would benefit the cosmetic sector. But we also knew we had to be the guardian of what is the most precious thing to consumers: transparency and trust.

We have been participating in the WG4 with Liaison A status, as experts like other associations (Cosmetics Europe...). Our input was to give technical advice and recommendations but we had no voting right (only the national member institutes can vote).

It was clear that the initiative was controversial and reaching consensus was extremely difficult. So, the guideline was split into two parts: The first one only definitions, the second part only criteria.

It is also important to emphasise that ISO 16128 is a “guideline”; it is not prescriptive, but rather is indicative, meaning it is a base for real standards. Here are some examples:

- GMOs: “can be considered as natural ingredients in certain regions of the world”;
- Green chemistry principles: “are recommended for these processes”;
- Halogenated non-mineral derivatives: use “is not recommended during processing of derived natural organic and mineral ingredients”.

COSMOS fought against these because inevitably different interpretations of this guideline will result in products that have contradicting ingredients. Could this be called transparency?

Overall assessment

- There are no precise or constraining criteria in this guideline: only some definitions and some not really consistent calculations.
- No third party control is required to attest compliance with the criteria.
- There are no criteria for the composition of the final products, nor for labelling, meaning that synthetic ingredients such as silicon, mineral oil, etc. can be present at high level in a product which could claim natural or organic content.

Some more technical points

- We are deeply against the acceptance of ingredients from dead animals such as squalene from shark, oils from fishes or seals.
- We are totally against GMO ingredients in natural and organic cosmetics.

- Many criteria are inconsistent:
 - Only a recommendation to use natural solvents **but** as there are no strict criteria it is possible if not available to use non-natural solvents in the manufacturing process;
 - Non-exhaustive and only “informative” list of reactions for chemically processed ingredients;
 - Only a recommendation not to use halogenated non-mineral derivatives;
 - Only a recommendation to use Green Chemistry principles, without any guidelines;
 - No specific criteria on perfumes which means that synthetic perfumes, absolutes, concretes, or real natural perfumes can be used without restriction. The only difference between these fully different perfuming approaches will be their contribution to the natural index;
 - No criteria on preservatives, so that all the preservatives accepted by the cosmetic regulations can be used, namely parabens, phenoxyethanol, etc.

Conclusion

This international process should have taken properly into account the experience and the knowledge of the leading and pioneer organizations in natural and organic cosmetics. With that basis, it could have become a real and valuable framework for the future regulations of natural and organic cosmetics. However, with the lack of constraining criteria, the inevitability of global inconsistency, we can only conclude that this project will fragment the development of the natural and organic cosmetic sector, and will not provide trust and consistency to consumers.