

COSMOS position statement regarding ISO 16128

February 2018

Introduction

COSMOS stands for integrity, transparency and clear standards that protect both consumers and the environment. ISO 16128 delivers none of these, just inconsistency and the risk of misrepresentation. It is no substitute for professional certification to an independent standard that provides trust and consistency to consumers.

Background

The popularity of organic and natural cosmetics has been rising rapidly over the last several years, recording significant growth in an otherwise static market. COSMOS, an initiative of the main international organisations dedicated to natural and organic cosmetics, is at the forefront of securing consumer trust in this new market by publishing and upholding the international standard for organic and natural cosmetics, the COSMOS-standard.

However, the conventional cosmetics industry, wishing to take advantage of this growing market, has also been at work developing rules under the auspices of the International Organization for Standardization (ISO). This was recently published as *"ISO 16128: Guidelines on technical definitions and criteria for natural and organic cosmetic ingredients and products"*. Its stated purpose is *"to encourage a wider choice of natural and organic ingredients in the formulation of a diverse variety of cosmetic products to encourage innovation"*.

Why did COSMOS participate?

For a long time consumers have demanded 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 they will be better for them, their families and the environment.

Transparency is important because of the huge gap between consumers' expectations and reality. This has created a damaging lack of trust – trying to choose a trustworthy cosmetic product is difficult for those who aren't experts. For this reason, COSMOS founders worked to harmonise their respective standards. They combined the best accepted definitions, criteria, ingredients and processes, and thus created the COSMOS-standard.

COSMOS has been participating in the working group that developed ISO 16128 with "Liaison A status", as experts. Our input was to give technical advice and recommendations but we have no voting right (only the national member institutes can vote).

Why COSMOS does not agree with the result

It was clear that the initiative was controversial and reaching consensus was extremely difficult – the industry in different countries has significantly different viewpoints. So, the guideline was split into two parts to try and facilitate progress: the first part *"Definitions for ingredients"*, the second part *"Criteria for ingredients and products"*. Part 1 was approved in 2015, part 2 in 2017.

The problems start already with the title of part 2, which is a misrepresentation of its contents. Part 2 contains no criteria, it contains only formulae for calculating organic and natural content. There is nothing about other ingredients, or how ingredients and products are to be manufactured.

COSMOS campaigned throughout for a guideline that it could support, or at least one that was not detrimental to consumers and to genuine organic and natural cosmetics manufacturers. However, the conventional industry ignored these concerns. Regrettably, the resulting ISO 16128 is both deficient and likely to be damaging. COSMOS cannot support it and rejects ISO 16128 for a number of reasons.

- Lack of transparency – the Guideline is not freely available to the public (it has to be purchased), nor was the public involved in the process, rather it was led and controlled by the conventional industry. The definitions endorse claims that are at best unclear and at worst misleading, and can be based on calculations of ingredients that can misrepresent their true content. All of these work against providing clear, helpful and correct information to consumers.
- Consumer expectations ignored – the industry has disregarded what consumers expect of organic and natural cosmetics. For example: “GMOs *can be considered as natural ingredients in certain regions of the world*”; there are no restrictions on petrochemical ingredients; “*derived natural ingredients*” can be up to 49.9% petrochemical; there is nothing on animal protection, preservatives, environmental aspects of manufacturing, or packaging.
- Guidelines, not requirements – ISO 16128 is a “guideline”, not a “standard”. It does not set “requirements” and indeed the annexes are titled as “informative”. It is already being misrepresented as a standard in the industry and being misused in the market place. This can only confuse consumers and it betrays their trust.
- No independent verification, no control – the organic market, and many others, take strength from third party checks of manufacturers’ claims. This Guideline has no provision for a control system, nor has any requirements for product labelling. It means that inconsistent and even contradictory claims can be made, and no third party will control them.

Conclusion

This international process should have taken properly into account both the expectations of consumers and the experience and the knowledge of the leading and pioneer organisations in organic and natural cosmetics. With that basis, it could have become a real and valuable framework for the future regulations of organic and natural cosmetics.

Instead, we now have an ISO guideline that is deficient, counterproductive and allows misleading consumer information. It will be especially problematic in areas of the world where there are no comparable regulations for consumer protection, as there are in the Europe and USA. Therefore, COSMOS feels duty bound to take action against this Guideline at all levels within its resources.

Contact

info@cosmos-standard.org
www.cosmos-standard.org

COSMOS-standard AISBL
Rue du Commerce 124
1000 Brussels, Belgium