



Q&A on the American National Standard for Personal Care Products Containing Organic Ingredients

NSF International recently published a new American National Standard for personal care products containing organic ingredients. Here are some questions and answers about the standard and certification to the standard.

The Standard

#1

Q: What is this standard?

A: NSF/ANSI 305: *Personal Care Products Containing Organic Ingredients* is a new American National Standard that defines labeling and marketing requirements for personal care products that contain organic ingredients.

#2

Q: How was the standard developed and who developed it?

A: The American National Standard was developed in accordance with the requirements set forth by the American National Standards Institute (ANSI), a private, non-profit organization that administers and coordinates the U.S. voluntary standardization and conformity assessment system. ANSI standards are developed based on the principles of due-process, participation and consensus.

NSF/ANSI 305 was developed through involvement of those who are directly and materially affected by the scope of the standard. This process ensures balanced input from public health/regulatory officials, users/consumer representatives and industry representatives. Organic personal care manufacturers, trade associations, regulators, organic program administrators, organic product retailers, and other stakeholders from the organic products community participated in the development of the new “contains organic ingredients” personal care standard.

If down the road, the USDA or NOP decide to engage organic personal care products, the U.S. Office of Management and Budget (OMB) circular A-119 would encourage them to rely on the consensus national standard, which in this case is NSF/ANSI 305.

#3

Q: Why was it developed?

NSF/ANSI 305 establishes a level playing field by setting requirements for organizations choosing to comply with an American National Standard for personal care products that contain organic ingredients. This is an important step for manufacturers and retailers that produce and sell organic non-food products, as well as for consumers interested in protecting the environment who choose to purchase certified organic products.

Now that the standard has been adopted, this means that companies producing products that comply with the standard can be certified to it – demonstrating that they meet the stringent requirements of the standard. This should provide a competitive advantage to those certified products, compared to products who simply claim they are organic without complying with and being certified to the American National Standard.

#4

Q: What are the requirements for NSF/ANSI 305?

A: NSF/ANSI 305 defines labeling and marketing requirements for personal care products that contains organic ingredients. The voluntary standard allows the “contains organic ingredients” designation for products with organic content of 70 percent (O70) or more that comply with all other requirements of the standard. To consider the intricacies of personal care product formulations and eliminate consumer confusion, the NSF standard is designed only for “contains organic ingredients” claims and allows for limited chemical processes that are typical for personal care products but would not be allowed for food products. NSF/ANSI 305 also requires companies to state the exact percentage of organic content based on the requirements of the standard.

#5

Q: How does this new “contains organic ingredients” standard compare to the USDA standard?

A: NSF/ANSI 305 is a voluntary standard, which allows the “contains organic ingredients” designation for products with organic content of 70 percent (O70) or more that comply with all other requirements of the standard. Products with an organic content claim of 100% are addressed by the USDA NOP and can comply with the USDA standard. Like the USDA National Organic Program (NOP) regulations, the NSF standard includes requirements on organic ingredients, material, process and production specifications and labeling. The NSF standard also requires that NOP certified ingredients be used. However, it allows for these organic ingredients to undergo certain chemical processes – methods considered synthetic under the NOP.

#6

Q: Are any other “contains organic ingredients” standards accepted as national standards?

A: No, NSF/ANSI 305 is the only American National Standard that allows labeling and marketing requirements for “contains organic ingredients” personal care products. There are other standards that enable organizations to become certified to their private standard, but NSF/ANSI 305 is the first consensus standard for “contains organic ingredients” personal care products in which all materially affected stakeholders – academia, regulatory, industry, and consumers – have discussed their expectations. It is also the only U.S.-based standard that allows certification by any certifying organization, rather than limiting that certification to the standard owner.

#7

Q: What products are covered by the standard?

A: Products covered by this standard include, but are not limited to: cosmetic products; rinse-off and leave-on personal care products; oral care products; and personal hygiene products. These products may be applied to or used externally on any part of the body (e.g. hair, face, hands and feet). For the purposes of this standard, cosmetics are considered personal care products.

#8

Q: Is this new standard the answer to one harmonized standard for organic personal care products?

A: Yes, this standard is a step in the right direction, and because it was designed through a balanced group of stakeholders, this standard should achieve strong market acceptance in the North American Market. Third-party certifiers can now compare this standard with the European standards and determine, by meeting the U.S. American National Standard, if those products also meet other international standards. Quality Assurance International (QAI), a USDA-accredited organic certifier, has finalized an agreement with NaTrue, one of the European Standards Owners, on how to streamline the certification process for companies interested in pursuing certification to both standards. Under the agreement between QAI and NaTrue, companies certified to NSF/ANSI 305 in the U.S. now have the option to simultaneously garner NaTrue certification in the EU. NaTrue, a Brussels-based international association of natural and organic cosmetics manufacturers, is dedicated to safeguarding the highest possible standards for natural cosmetics. The mutual agreement is expected to open up new growth opportunities in the EU for personal care companies whose products contain organic ingredients.

#9

Q: Who is NSF International?

A: NSF International, established as the National Sanitation Foundation, is an independent, not-for-profit, standards development and testing/certification organization. For 65 years, NSF's mission has been to protect and improve public health by certifying products and writing standards for food, water and consumer goods. Headquartered in Ann Arbor, Michigan, NSF has offices located throughout North America, Europe, Asia and South America.

#10

Q: How is NSF involved?

A: In addition to helping develop NSF/ANSI 305: *Personal Care Products Containing Organic Ingredients*, NSF has developed over 50 other public health and safety standards and protocols, and annually tests and certifies over 225,000 products in 100 countries. NSF's standards are accredited by the American National Standards Institute (ANSI) and the company is accredited by the International Accreditation Service (IAS) and the Standards Council of Canada (SCC), among others.

Certification

#1

Q: Who can certify to the new standard?

A: Any interested organic certifying agents can certify to the standard. This is unlike private standards that limit who can certify to them.

#2

Q: What does the certification process entail?

A: Certification includes meeting all of the requirements of the standard (see response to question #4 under the standard section) in addition to completing the following steps to verify compliance:

- Application
- On-site Inspection (annual inspections will verify ongoing compliance)
- Technical Review
- Resolution & Notification
- Certification

This process provides the consumer with confidence in the products they choose to purchase. Testing is not required to determine whether a product is organic or meets this standard, as the organic claim is a process claim, not a product claim.

#3

Q: How do you know if a product has been certified to NSF/ANSI 305?

A: The NSF 305 personal care logo will identify personal care products that have achieved certification to the standard.

