Guide to COSMOS V4 Standard Changes

This guide has been created to give an overview of the 7 main changes in version 4 of the COSMOS standards, what this means for you and the implementation date(s) whereby products/procedures must be compliant with the new standards.

We recommend reading the standards in full for an overview of all changes.

Key Dates

Jan 2023
COSMOS V4 Standards Published

Jun 2023
New* products must meet V4 of the standards
See exceptions and their specific implementation dates further in the timeline.

Dec 2024
Old** products must meet V4 of the standards
See exceptions and their specific implementation dates further in the timeline.

Jun 2025
Old** products must meet V4 packaging standards

Dec 2024
New* & Old** products must meet Organic PPAI (COSMOS organic only) and harvesting raw materials standards.

Jan 2029
Sulphated surfactants for rinse off products no longer permitted

* ‘New’ = products that have an application date after 1st June 2023
** ‘Old’ = products that have an application date before 1st June 2023
○ = exceptions that have a different implementation date
Palm Oil & Palm Oil Derivatives
Standard: 7.4

Implementation date: 1st Jun 2023 (New Products) / 1st Dec 2024 (Old Products)

Summary of Change(s)

Palm oil, palm kernel oil and their derivatives used in cosmetic products and cosmetic ingredients must be:

• certified organic or
• certified sustainable to one of the following standards: RSPO, SAN, RSB or UEBT

This applies to raw materials and when part of a blend/mixture

Evidence Required

Organic

Valid organic certificate listing raw material/blend/mixture
Certificate must be from your direct supplier

Non-Organic

Raw Material
Valid certificate showing certification, to one of the accepted sustainable standards, listing the ingredient
Certificate should be from your direct supplier, however a certificate from further up the supply chain can be accepted so long as there is sufficient evidence to demonstrate this is the source of the ingredient i.e. invoices, delivery notes, etc.

Blend/Mixture
CSPO certificate listing blend/mixture or

Statement from the supplier producing the blend, stating that they only use sustainable ingredients and
Valid certificate of the supplier producing the ingredient to one of the accepted sustainable standards
Mineral & Mineral Origin Ingredients
Standard: 6.1.2, Appendix IV

Implementation date: 1st Jun 2023 (New Products) / 1st Dec 2024 (Old Products)

Summary of Change(s)

- 8 mineral origin ingredients no longer permitted
  aluminium sulfate, barium sulfate, copper, copper sulphate, silver chloride, ferrous sulfate, potassium thiocyanate, zinc carbonate
- Titanium dioxide permitted in sunscreen and decorative cosmetic products only
- CI 77288 permitted under appendix V until alternatives are available
- Minerals may be treated with physical processes listed in appendix I
- Mineral origin ingredients must comply with 4 Green Chemistry principles (listed in the standards)
- COSMOS recommend due diligence on sourcing and independent certification (e.g. MICA standard)
- Quantitative SEM analysis results required to be provided if the following used:
  cerium dioxide, hydroxyapatite, silica, titanium dioxide, zinc oxide

Evidence Required

Completed Raw Material Questionnaire (RMQ) [v6]
Additional questions and information requested as part of RMQ

Quantitative SEM analysis results
If applicable
Summary of Change(s)

Nanomaterials* are accepted for
- Titanium dioxide (UV filters in sunscreen products only)
- Zinc oxide (UV filters in sunscreen products only)
- Silica

Other nanomaterials* that have a particle size distribution of 50% or more, on the scale from 1 to 100nm, are prohibited

* As defined by the European Cosmetic Regulation

Evidence Required

Completed Raw Material Questionnaire (RMQ) [v6]
Additional questions and information requested as part of RMQ
Physically Processed Agro-Ingredients (PPAI)
Standard: 7.1.1, Appendix VI

Implementation date: 1st Dec 2024 (New & Old Products)

Summary of Change(s)

New plants added to mandatory list of PPAIs that must be organic (COSMOS Organic only)
28 new plants added – see Appendix VI for full list of plants, including common and INCI names

Wild plants accepted if organic certified

Evidence Required

Single Ingredient PPAI & Wild Plants
Valid organic certificate listing ingredient
Certificate must be from your direct supplier

Blend/Mixture (less than 3 components)
Valid organic certificate listing ingredient or certified blend
Certificate must be from your direct supplier

Complex Mixture (more than 3 components)
All components listed in appendices VI/VII of the standards
Valid organic certificate listing certified blend
Certificate must be from your direct supplier

Exception
if complex mixture contains at least one component not listed in
Appendices VI/VII then none of the components have to be from organic agriculture.
Harvesting Raw Materials
Standard: 6.1.3

Implementation date: 1st Dec 2024 (New & Old Products)

Summary of Change(s)

It is forbidden to use primary raw materials harvested / collected by threatened species listed in the IUCN red list [Critically Endangered (CR), Endangered (EN) and Vulnerable (VU)]

Evidence Required

Evidence from your supplier confirming no threatened species are used for harvesting/collection purposes, such as:
• An attestation or declaration
• Product sourcing or supplier policy

We are currently aware of this applying to coconuts that are harvested by Northern & Southern Pig-tailed Macaques (both appear on the IUCN red list) however further raw materials/species may apply
Packaging
Standard: 8.3

Implementation date: 1st Jun 2023 (New Products) / 1st Jun 2025 (Old Products)

Summary of Change(s)

Each SKU must comply with a minimum of 3 indicators from (a minimum of) 2 different principles
See standard x for list of indicators and principles

Packaging should be improved against standard criteria at least every three years
It must be demonstrated that opportunities for improvements were reviewed

Records of packaging material quantities used against quantities of sales unit must be kept

Evidence Required

New COSMOS packaging form
Correctly completed confirming compliance

Evidence to demonstrate packaging and opportunities for improvements have been reviewed
Required every 3 years, for example:
• Meeting minutes
• Packaging Policy
• Product testing results

Records showing packaging material quantities used against quantities of sales unit (in-number of in-weights)
Implementation date: See Summary of Changes

Summary of Change(s)

Sulfated emulsifiers not permitted - 1st Jun 2023 (New Products) / 1st Dec 2024 (Old Products)

Sulfated surfactants only permitted for rinse off products - 1st Jan 2029

Evidence Required

Completed Raw Material Questionnaire (RMQ) [v6]
Additional questions and information requested as part of RMQ