

## UPDATE OF THE COSMOS STANDARD SCHEME DOCUMENTS

## **Relevant changes in the COSMOS-standard V4.0**

COSMOS-Standard AISBL continually reviews the criteria that companies must meet to ensure their products are genuine organic or natural cosmetics produced to the highest feasible sustainability practices.

In this latest version, Version 4, we are pleased to have strengthened criteria and added new ones across the five key priorities below. The changes that have been implemented are the result of a far-reaching internal review by COSMOS working groups, including external expert input and subject-specific surveys among companies with COSMOS certified product and ingredients. In addition, a public consultation process took place in 2021 to ensure that feedback was incorporated from the wider COSMOS network.

The key priorities under review in V4.0 were:

- Palm oil and its derivatives
- Mineral and mineral original ingredients
- Ingredients and processes
- List of organic physically-processed agro-ingredients (PPAI)
- Sustainable packaging

This information paper lists the sections of the COSMOS-standard Scheme Documents where the relevant changes have been done, by comparing:

- V3.1 to V4.0 for the COSMOS-standard
- V3.1 to V4.0 for the Labelling Guide
- V3.2 to V4.0 for the Technical Guide
- V3.2 to V4.0 for the Control Manual

As the list is not exhaustive, the COSMOS-standard Scheme Documents Version 4.0 remain the sole reference for all changes, including <u>editorial</u> changes.

The version V4.0 of the COSMOS-standard applicable set of Scheme Documents consists of:

- V4.0 of the **COSMOS-standard** (published 1 Dec 2022)
- V4.0 of the COSMOS-standard **Technical Guide** (published 1 Dec 2022)
- V4.0 of the COSMOS-standard Labelling Guide (published 1 Dec 2022)
- V4.0 of the COSMOS-standard **Control Manual** (published 1 Dec 2022)

This document is for the use of authorised Certification Bodies and their clients and for the COSMOS-standard nominated Accreditation Bodies.

1 December 2022

SECTION §	SCHEME DOCUMENT	RELEVANT CHANGES IN V4 COMPARED TO: ►COSMOS-standard V3.1 + COSMOS-standard Labelling Guide V3.1 ►COSMOS-standard Technical Guide V3.2 + COSMOS-standard Control Manual V3.2
1.2.4 New	Standard	Added definitions of Verbal forms used in the Standard scheme documents. (page 4)
3	Standard	Updated the definition of Scope 2. (page 4)
	<b>Technical</b> <b>Guide</b> (page 10)	Updated in conjunction with the Standard change in Scope 2, regarding "service provider".
4	Standard	Added the definition of Base formulas which was previously showing in the Technical Guide v3.2. (page 6)
		Removed the definition of Contaminant. (page 6)
		• Added clear definitions of Decorative cosmetic & Sunscreen product in conjunction with the new restriction for Titanium Dioxide, CI 77891 detailed in Appendix IV (see below). (page 6)
		• Updated the definitions of Organic and Organic content in order to be more precise on the internationally recognized organic standards (EU, US, IFOAM Family of Standards). (page 7)
		<ul> <li>Removed section on "raw material" in the definition of Cosmetic ingredient in conjunction with below added definition of Raw materials. (page 6)</li> </ul>
		<ul> <li>Added the definitions of Primary Packaging &amp; Secondary Packaging in conjunction with the updated Section §8.3 (see further below). (page 7 &amp; 8)</li> </ul>
		<ul> <li>Added and clarified the definition of Raw materials (see connected sections §11.2 + §10.4, §10.5 &amp; §10.6 below for subsequent rules to certify them). (page 7)</li> </ul>
		<ul> <li>Updated the definition of Rinse-off product with clarification previously showing in the Technical Guide v3.2. (page 8)</li> </ul>
		• Added the definition of Wild plant in conjunction with the clarification brought to Appendix VI. (page 8)
	Technical Guide (page 11)	Added the need to recalculate organic percentage of ingredients certified by recognized standards.

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5.1.1	Standard	Updated & clarified the definition and criteria related to Nanomaterials. (page 9)
	<b>Technical</b> <b>Guide</b> (page 12)	<ul> <li>Edited the section regarding Nanomaterials in conjunction with the updated criteria in the Standard.</li> <li>Edited the part related to Silica.</li> </ul>
5.3.1	Standard	Updated criteria on sustainable sources. (page 9)
6.1.2	Standard	Added criteria on ethical and socially responsible sourcing. (page 11)
		• Clarified treatment processes that can be used for <i>Minerals</i> from treatment processes that can be used for <i>Ingredients of mineral origin</i> following green chemistry principles. (page 12)
6.1.3	Standard	• Added the primary raw materials harvested/ collected by threatened species listed in the IUCN red list to the list of forbidden use. (page 12)
	Technical Guide (page 14)	<ul> <li>Added starfish extract as prohibited ingredient of animal origin.</li> <li>Added case of mushrooms.</li> <li>Added example when threatened species listed in the IUCN red list are used for the harvest of primary raw materials.</li> </ul>
6.1.4	Standard	Updated the table regarding Aquatic toxicity requirements. (page 14)
		• Updated the criteria related to Green Chemistry, reflecting the requirement of two out of three measures during manufacture from the three detailed principles. (page 15)
6.2.3	Standard	• Distinguished 'fruits' from 'watery fruits' (reference the US "Food Data Central" database). (page 17)
	Technical Guide (page 16)	Added cases of dehydrated aloe vera powder in products to reconstitute.
6.2.4	Technical Guide (page 23)	Updated example calculation of hydroglyceric extracts organic percentage.

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7	Technical Guide (page 26)	Added general rule and particular case.
7.1.1	Standard	• Edited to clarify that the requirement applies only to soap and alcohol-based products. (page 18)
	Technical Guide	Added precision regarding remaining percentage of water in soap.
	(pages 26,	<ul> <li>Detailed two possible ways to list ingredients in INCI lists of soaps.</li> </ul>
	27)	Edited the calculation example 2 on soap made with soap noodles.
7.1.2	Technical Guide (page 28)	Detailed the two different cases of reconstituted products: solid powders and solid bars.
7.2	Technical Guide (page 29)	Detailed the two different cases of reconstituted products: solid powders and solid bars.
7.4	Standard	Updated the criteria on palm oil and palm oil derivatives. (page 19)
	Technical	Edited in conjunction with the updated criteria in the Standard palm oil and palm oil derivatives.
	Guide (page 29)	Added a reference to the subject of Shortage.
8	Technical Guide (page 30)	Added precision case of sharpenable pencils.
8.3	Standard	• Clarified the cases when the (new) criteria on Packaging is applicable. (page 21)
	Technical	Edited with decorative cosmetic in conjunction with definition added to §4 (see above).
	Guide (page 30)	<ul> <li>Added precision point on lip balm to case of external part of lipstick.</li> </ul>
		• Added manufacturing auxiliaries for the production of packaging materials (e.g., tallow) to the list of items exempted of compliance check to the criteria.

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8.3.1	Standard	• Updated criteria on sustainable packaging, introducing the requirement to comply with a minimum of three indicators from a minimum of two different principles out of the four listed. (page 21)
	Technical Guide (page 31)	Added some examples (non-exhaustive) of possible indicators to demonstrate criteria compliance.
8.3.2	Standard	• Updated criteria with notion of demonstrating opportunities for improvements & keeping specific records. (page 22)
8.3.3	Standard	Reviewed criteria for clarification on limitation of recycled materials. (page 22)
8.3.4	Standard	<ul> <li>Added nine materials to the detailed list of forbidden materials to be used in packaging. (page 22)</li> <li>Removed the requirement on proof of non-usage. (page 22)</li> </ul>
8.4	Standard	• Integrated clarification points on criteria and specific cases that were previously listed in the Technical Guide v3.2. (page 23)
9.2	Technical Guide (page 33)	Edited paragraph on products endorsed by environmental labels.
9.2.1	Standard	• Clarified that criteria applies to all processing stages (e.g. tanks, tools) by integrating information previously showing in Technical Guide v3.2. (page 24)
9.2.2	Standard	Updated with disinfection materials previously listed in the Technical Guide v3.2. (page 24)
9.2.3 New	Standard	• Created a separate section on what cleaning materials may contain and added criteria regarding palm ingredients and/or derivatives that are not certified CSPO. (page 24)
<b>9.2.4</b> formerly 9.2.3	Standard	• Section number changed further to new §9.2.3. (page 25)
9.2.5 formerly 9.2.4	Standard	• Section number changed further to new §9.2.3. (page 25)

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10.2 & 10.3	Standard	• Added alternative mentions as listed & extended mentions to respond to requirements related to the US Organic Foods and Farming Act (previously known as COPA - California Organic Products Act).
(pages		Clarified criteria for cases when there are two qualities of raw materials in the same formula.
26 & 27)		Updated wording options for organic ingredients or from organic raw materials in INCI list.
		<ul> <li>Integrated clarification for using maximum two decimals in the percentages.</li> </ul>
	Technical Guide (page 34)	<ul> <li>Added equivalent meaning for 'salt' as per the US Organic Foods and Farming Act (previously known as COPA – California Organic Products Act).</li> </ul>
10.4	Standard	• Updated criteria in conjunction with the clarified definition of raw materials (see section §4 & §11.2). (page 28)
10.5	<b>Technical</b> <b>Guide</b> (page 35)	Added examples of operator responsibilities for the use of COSMOS APPROVED label.
10.6	Standard	• Updated criteria in conjunction with the clarified definition of raw materials (see section §4 & §11.2). (page 28)
10.8	Standard	<ul> <li>Integrated introduction part on registered trademarks from the Labelling Guide v3.1. (page 28)</li> </ul>
		• Editorial change in conjunction with the clarified definition of raw materials (see section §4 & §11.2). (page 28)
		• Integrated section on pseudo-organic logos and seals from the Labelling Guide v3.1. (page 29)
11.1	Standard	• Editorial change in conjunction with the clarified definition of raw materials (see section §4 & §11.2). (page 30)
11.2	Standard	<ul> <li>Updated criteria on raw materials approval in conjunction with the clarified definition of raw materials (see section §4). (page 30)</li> </ul>
12.3	Standard	• Updated transitional measures detailing general rule and specific cases in conjunction with criteria change for §6.1.3, §8 and Appendix II. (page 31)

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Appendix I	Standard	<ul> <li>Added criteria for non-organic raw materials regarding preservation or treatment of primary plant materials checking. (page 34)</li> <li>Added criteria on auxiliariae used for the physical preservation of anomalia page instantiation (page 34)</li> </ul>
		Added criteria on auxiliaries used for the physical processing of organic agro-ingredients. (page 34)
	Technical Guide (page 39)	• Added examples of non-organic raw materials in conjunction with the new criteria in the Standard on preservation or treatment of primary plant materials.
Appendix	Standard	Added restrictions and allowance for sulfation/sulfatation process. (page 35)
II		• Added criteria on preservation or treatment of primary plant materials checking. (page 35)
		• Added criteria on sodium hypochlorite used as auxiliary. (page 36)
	Technical Guide (page 39)	• Added some examples of non-organic raw materials in conjunction with the new criteria in the Standard on preservation or treatment of primary plant materials.
Appendix III	Standard	Updated the list of processes not allowed by clarifying, adding or removing items. (page 37)
Appendix IV	Standard	• Removed CI 77288 due to negative impact on the environment (added to the "Other ingredients" list of App. V, so that it can still be used until an alternative is found as it has currently no viable substitute). (page 38)
		<ul> <li>Added a restriction to the use of Hydroxyapatite. (page 39)</li> </ul>
		• Added Glass (65997-17-3). (page 39)
		• Removed Sodium Borate as it is prohibited by the EU Cosmetic regulation. (page 40)
		• Restricted the use of Titanium Dioxide, CI 77891. (page 41)
		• Removed Aluminium sulfate, Barium sulfate, Copper, Copper sulfate, Silver chloride, Ferrous sulfate, Potassium thiocyanate and Zinc carbonate due to their negative impact on the environment. (pages 38 to 41)
		• Replaced INCI chemical names by CAS numbers. (pages 38 to 41)

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Appendix V	Standard	• Edited introduction. (page 42)
·		• Changed list review cycle to 'at every standard revision' to conform to the existence of new compliant alternatives. (page 42)
		Updated restriction of use for Tetra Sodium Glutamate Diacetate. (page 43)
		Clarified the "sum of" petrochemical moieties. (page 43)
		• Added CI 77288 to "Other ingredients" list in conjunction with change in Appendix IV (see above). (page 44)
Appendix VI	Standard	• Added Wild plants are accepted if certified organic in order to address the wild harvest question raised at consultation stage. (page 45)
		• Added a restriction for Apricot/ Prunus Armeniaca Kernel Oil in order to exclude the case of essential oil abstracted from apricot kernel almond which is extremely rarely available in organic grade. (page 45)
		• Added non-fertilised chicken egg and its derivatives to the list, based on the assumption that those at least are available in quantity and quality. (page 46)
		• Extended list. (pages 45 to 49)
Appendix VI & VII	Technical Guide (pages 40, 41)	• Added a precision on the refined oil for which the INCI name can be the same as the one used for a non-refined oil.
VIQVII		Clarified the meaning of 'shortage' in the Standard.
		• Paragraph on shortage re-focused on certified raw material, with clarification on organic raw material case.
		Added that permission is checked at each new raw material purchase.
		Added paragraph on records keeping.
Appendix VIII	Standard	• Edited in order to differentiate the exceptions for aquatic toxicity and biodegradability from the exceptions for atom economy in processes of fermentation and perfumes ingredients. (page 51)
Appendix	Standard	Removed fabric components in conjunction with criteria change in §8.3 (see above). (page 52)
IX		• Edited with decorative cosmetic in conjunction with definition added to §4 (see above). (page 52)

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5	Labelling	<ul> <li>Added case when a COSMOS ORGANIC product is part of a COSMOS NATURAL range.</li> </ul>
	Guide (pages 5, 6)	• Added case of gift boxes and sets of products that include both COSMOS ORGANIC & COSMOS NATURAL products.
5 & 6	Labelling Guide (pages 5 to 8)	Editorial change to 'plain' seal or logo (i.e. without any additions)
		<ul> <li>Added labelling requirements when certification by more than one COSMOS authorised Certification Body.</li> </ul>
		• Added exceptional cases when seal or logo can include additional references (e.g. ORGANIC, BIO, NAT, NATURAL).
		<ul> <li>Editorial change on use of COSMOS CERTIFIED signature when 'organic' or 'natural' are in conflict with relevant national laws.</li> </ul>
7 & 8	Labelling Guide (pages 9, 10)	Editorial change to 'plain' seal or logo (i.e. without any additions)
		• Updated criteria in conjunction with the clarified definition of raw materials (see Standard sections §4 & §11.2).

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5	<b>Control Manual</b>	<ul> <li>Removed reference to IAF/ILAC A5 Multi-Lateral Mutual recognition arrangements, no longer applying.</li> </ul>
	(page 4)	<ul> <li>Added new normative reference: IAF MD 4:2022 IAF Mandatory Document</li> </ul>
6.1		<ul> <li>Finetuned the annual report requirements for Accreditation Bodies.</li> </ul>
	(page 5)	Clarified the point of confidentiality on Certification Bodie's information & non-disclosure.
7.1 f)	Control Manual (page 7)	Added language minimal skill requirements.
7.3.4 4)	<b>Control Manual</b> (page 8)	Clarified the focus on the accreditation assessment.
7.4.3	<b>Control Manual</b> (page 9	• Updated criteria in conjunction with the clarified definition of raw materials (see Standard sections §4 & §11.2).
8.2.1	Control Manual (page 13)	<ul> <li><u>Competence review</u>: removed 'on-site' for the accompanied audits.</li> </ul>
8.3.2	<b>Control Manual</b> (page 14, 15)	<ul> <li>Scope 2: updated criteria in conjunction with the clarified definition of raw materials (see Standard sections §4 &amp; §11.2).</li> </ul>
		<u>Audit protocol</u> : added a reference to circumstances for remote audits.
8.3.4 c)	Control Manual (page 17)	<ul> <li>Removed reference to the COSMOS-standard from the list of the scope details.</li> </ul>
8.3.5	<b>Control Manual</b> (page 18)	• Updated criteria in conjunction with the clarified definition of raw materials (see Standard sections §4 & §11.2).