

**From:** David Bronner [mailto:allone@drbronner.com]  
**Sent:** Thursday, January 24, 2008 9:08 PM  
**To:** 'Personal Care Forum'  
**Subject:** Analysis of NOP "Organic" vs NSF "made with Organic" Personal Care

Hello All:

The NSF decision-making process extended over many years, with its origins in the OTA's Personal Care Task Force. It involved a multi-stakeholder group, including industry, consumer and regulatory/trade representation. Originally the NSF standard was going to be a two-tiered standard, certifying both outright "Organic" product claims as well as "made with Organic" product claims. This follows the USDA model, where the "Organic" category is more strict in organic content and non-organic allowances, than the "made with Organic" category. For instance, under the NOP, sulfur dioxide is allowed in "made with Organic" wines, but not "Organic" wines.

At a certain point late in the NSF process, we realized that the NSF "Organic" category was more or less exactly the same as the existing USDA NOP Organic category, as far as processes and allowances. Numerous soap, lotion and balm products had already been introduced and certified under the USDA NOP. Thus by a large majority vote, the NSF Personal Care Group decided to just have "Organic" personal care continue to be certified to the existing USDA NOP "Organic" standard, and confine the NSF standard to delimiting/expanding the universe of "made with Organic" claims for personal care.

Section **5.3 Allowed Processes and Ingredients** of the NSF standard notes that:

**All processes allowed under the NOP are allowed for this Standard. Of particular relevance are the following:**

- Cooking vegetable oils or animal fats with NOP-allowed alkali to make soap;**
- Utilizing NOP-allowed enzymes or alkali to hydrolyze organic proteins, and carbohydrates, and;**
- Cooking organic oil and alcohol together, optionally in the presence of NOP-allowed alkali, to make organic ester ingredients.**

Organic is about very limited processing of organic agricultural material, and the NOP synthetic allowances are generally for simple single-step "kitchen chemistry" processing. For example, calcium sulfate is allowed under the NOP, and is used to make tofu out of soybeans. Similarly, making soap with NOP-allowed alkali has been allowed and certified under the USDA NOP ever since the program launched in 2002. This is because soap-making is more similar to making tofu than it is to modern surfactant synthesis, where even relatively ecological plant-based surfactants are much more process- and input-intensive. No non-soap surfactant can be produced in a kitchen, and in the factories where they are made, very little so far have been produced from organic material owing to the intensive hydrogenation reaction necessary to make fatty alcohols, which is the basic sub-ingredient needed for most modern plant-based surfactants. The categorical and historical difference between traditional simple soap-making versus modern process-intensive surfactant manufacture, is reflected in the exemption of soap from the FDA regulation of cosmetics. Soap has and continues to be made from organic oils in very simple home kitchen-style operations as well as factories, and there are numerous boutique home soap-crafters. The back-to-nature soap-crafter movement of the last few decades parallels the general organic movement as a whole, that rejected "Better Living through Chemistry" that characterizes modern process/synthetic-intensive agriculture, food and personal care.

Just as the organic movement is a reaction to modern synthetic-reliant conventional agriculture and food-processing, USDA NOP organic personal care is a reaction to the highly-processed synthetic-dominated formulations of pseudo "natural" and even "organics" positioned brands.

True organic USDA NOP personal care does not utilize any synthetic preservatives, instead relying on concentration, low water-activity, pH, packaging, essential oil blends, ethanol and other natural ingredients as necessary, in a holistic approach to robust broad-spectrum preservation. Natural saponins like Quillaja Extract are used as emulsifiers instead of modern mineral-acid-catalyzed ester products. Natural unrefined oils and waxes are used as emollients and moisturizers, instead of hydrogenated fatty alcohols and synthetic silicones. Traditional simple soaps are used in hand and body washes, instead of modern surfactants.

There is however a big difference between modern surfactants that are based solely on renewable plant-based resources, versus those which are made in part or entirely from petroleum compounds. So while processes like hydrogenation and sulfation have no part in "Organic" personal care products, they do not utilize carbon compounds from petroleum, so have a place in "made with Organic" personal care products, which is what the NSF standard is all about. Under NSF, the "made with Organic" claim is accurate and truthful, representing the commendable practice of utilizing certified organic versus conventional agricultural material in these more intensive processes. The NSF standard incentivizes as a crucial goal, the use of organic material in the more intensive processes it allows, through a requirement that once a given processed ingredient is made from organic material, that organic form of the ingredient must be used by certified companies using that ingredient, and no longer the conventional form.

**The NSF standard certifies a "Made with Organic (up to 3 specified) Ingredients" OR "xx% Organic" claim for personal care where:**

- 1) 1) **Various processes and associated non-organic reagents/catalysts, as well as certain synthetic preservatives, are allowed that are not allowed under the USDA NOP.**
- 2) 2) **Organic forms of processed ingredients must be used if commercially available.**
- 3) 3) **Minimum 70% organic content by non-water/non-salt weight.**

Thus, under the NSF unlike the NOP, coconut oil can be transesterified with methanol (from natural gas) to produce methyl esters, which can be then hydrogenated with hydrogen (also derived from natural gas) at extremely high pressure in the presence of a metal catalyst to produce coco fatty alcohol. The coco fatty alcohol can then be sulfated with sulfur trioxide (the sulfur being derived from coal-refining), in a falling film reactor, and then finally neutralized with sodium hydroxide (derived by running electricity through salt water and the only substance in the process allowed by NOP other than the coconut oil). Alternatively, the coco alcohol could be combined with glucose in the presence of a very strong hybrid acid to make coco glucoside. Both Sodium Coco Sulfate and Coco Glucoside are biodegradable plant-based surfactants, but they are categorically more process-intensive than NOP allowed soap-making, and unlike liquid soaps, are difficult to preserve without synthetic preservatives, some of which are also allowed under the NSF standard, but which are anathema to true "Organic" products.

The Organic Consumers Association has reluctantly endorsed the NSF standard with the understanding that organic materials are incentivized to be used in the intensive non-NOP processes allowed under NSF, such as hydrogenation and sulfation. **But crucially no outright "Organic" product claims are permitted, versus more restricted "made with Organic" claims.** E.g. It is not "Organic Shampoo" based on "Organic Sodium Coco Sulfate", but "Shampoo" with an "xx% Organic" claim, based on "Sodium Coco Sulfate made with Organic Coconut Oil."

It is important to address Tom's first post regarding what synthetic substances, particularly reagents and catalysts in addition to synthetic preservatives, are included in the NSF standard, that one day may be petitioned to USDA for inclusion for "made with Organic" personal care. The allowed reagents and catalysts are noted explicitly in the Appendix to the standard in the context of the listed allowed processes. So in addition to the NOP-allowed enzymes and alkali (**Potassium/Sodium Hydroxide**), the reagents and catalysts allowed under NSF are:

**Metal Catalysts (Nickel, Platinum, Palladium)**  
**Copper Chromite**  
**Zinc Oxide**  
**Strong Mineral Acids (Sulfuric, Phosphoric, HCl)**  
**Strong Hybrid ChlorSulfonic Acid**  
**Methanol**  
**Phosphorous Trichloride or Thionyl Chloride**  
**Hydrogen**  
**Sulfur/Sulfate**

These individually or in various combinations enable the following more intensive NSF-allowed processes to happen:

**Steam-splitting of oils to produce fatty acids**  
**Mineral Acid-catalyzed esterification or transesterification (acid-catalyzed hydrolysis also)**  
**Hydrogenation of oils**  
**Hydrogenolysis of methyl or ethyl esters of an oil with hydrogen to make fatty alcohols**  
**Glucosidation**  
**Sulfation**  
**Protein fragment (non-petroleum) acylation**

The above reagents and catalysts should probably be listed in the Appendix separately, along with the NOP list in its entirety of allowed substances that are also automatically allowed under NSF. **The NOP List is inserted below at the end for review.**

The issue of preservation has come up, and there are quite a few more preservative compounds that can be used under NSF than are specifically noted in the body of the standard, that are enabled primarily by the processes of hydrolysis, hydrogenation and esterification. The specific listed preservatives are (note I think salicylic acid and its salts should be listed here, but got dropped):

**Benzoic Acid (natural source only)**  
**Grapefruit Seed Extract**  
**Potassium Lactate**  
**Potassium Sorbate**  
**Sodium Benzoate (natural source only)**  
**Sorbic Acid**  
**Benzyl Alcohol (natural source only)**

As Curt pointed out, GSE can be made by a sequence of processes allowed under NSF, so does not technically need to be separately listed. Similarly, natural-source benzoic acid, sodium benzoate and benzyl alcohol are also made by NSF allowed processes (and associated reagents and catalysts) from natural Cinnamic Aldehyde from Cassia Oil, via Benzaldehyde => Benzoic Acid => Benzyl Alcohol OR Sodium Benzoate.

But the main point on preservative ingredients under NSF, in addition to the more holistic formulation approach that Curt outlined, is there are a number of other preservative compounds that can be made with NSF-allowed processes, and something that would benefit the NSF standard, is to include in the Appendix the exhaustive "Positive List" from the German "Natural" standard BDIH. The BDIH standard has an identical allowance of processes and synthetics to NSF, so the overall Positive List of ingredients should be identical and could just be swapped in from BDIH. I'm including the BDIH list in its entirety under the NOP List for people to review at the end of this email, to realize what specific ingredients can be made and used under the NSF standard via the allowed processes and synthetic allowances. It is important to note, at the largest natural products show in the world, Biofach in Germany, that no personal care company may exhibit in the personal care hall that does not comply with the BDIH standard for all

products. In particular for preservatives, the following can be produced by NSF-allowed processes and are thus permitted under NSF, which are on the BDIH list but which are not separately listed in the NSF standard:

**Capryloyl Glycine**  
**Glucose & Lactoperoxidase & Glucose Oxidase**  
**Glyceryl Caprate**  
**Glyceryl Caprylate**  
**Glyceryl Laurate**  
**Lauroyl Lysine**  
**Undecylenoyl Glycine**

Note these are all anti-microbials. Citric acid for chelating effects, and its salts is allowed on the NOP list as well as BDIH list. So are tocopherols, ascorbic acid and tartaric acid for anti-oxidant effects, all of which are thus permitted under NSF. But gluconic acid is another good natural chelating simple organic acid, that BDIH allows that NSF should as well. Basically, by incorporating the BDIH positive list, as having identical process and ingredient allowances and screens, the NSF standard will be improved in clarity, usability and comprehensiveness. In contributing to the Natural Products Association's new "Natural Standard", I made sure both the basic NSF allowed process list, and the exhaustive BDIH positive ingredient list, were included. Under BDIH, if an ingredient is not on the list, than it cannot be used until it has been petitioned for inclusion as meeting the BDIH requirements. A similar approach makes sense for NSF, and a lot of work can be saved by simply copying the BDIH list in. I will be posting this e-mail in its entirety to the NSF site as a comment for review, with this particular recommendation a key relevant one to make.

So in conclusion, I think the NSF effort is a worthwhile effort for delimiting the "made with Organic" space in personal care, and a great step towards addressing the rampant abuse of organic claims in the US market. However, it is crucial that efforts that attempt to conflate an NSF "Made with Organic" type standard with true "Organic" products as defined by the USDA NOP, be rejected. Organic consumers are mobilizing to ensure that companies greedy for outright "Organic" product designations on personal care products based on hydrogenated and/or sulfated ingredients preserved with synthetic preservatives as allowed under NSF, are not conflated with "Organic" personal care certified under the USDA NOP. We at Dr. Bronner's are pleased to be introducing at Expo West eighteen new products ranging from body washes to shaving gels to a hair conditioning rinse, all bearing the USDA organic seal. These products are categorically different from products that would be certified under NSF, and the outright Organic designation should be reserved for such NOP products, versus the "made with Organic" designation certified under the NSF standard. Not only ourselves, but many other brands are figuring out how to formulate high-performance products under the USDA NOP standards.

So let's celebrate and recognize where each product category is, and how the NSF "made with Organic" standard complements USDA NOP "Organic" personal care. I look forward to the day, sooner versus later, when there is comprehensive federal regulation of personal care in the US, such that "Organic" products must comply with current USDA NOP Organic regulations, and "made with Organic" claims must comply with the emerging NSF standard.

Best,

David Bronner  
Dr. Bronner's Magic Soaps

**NOP Nonsynthetics allowed:**

- Animal enzymes – (Rennet - animals derived; Catalase – bovine liver; Animal lipase; Pancreatin; Pepsin; and Trypsin).

- Bentonite.
- Acids (Alginic; Citric - produced by microbial fermentation of carbohydrate substances; and Lactic).
- Agar-agar.
- Calcium carbonate.
- Calcium chloride.
- Calcium sulfate - mined.
- Carageenan.
- Colors, nonsynthetic sources only.
- Dairy cultures.
- Diatomaceous earth - food filtering aid only.
- Enzymes--must be derived from edible, nontoxic plants, nonpathogenic fungi, or nonpathogenic bacteria.
- Flavors, nonsynthetic sources only and must not be produced using synthetic solvents and carrier systems or any artificial preservative.
- Glucono delta-lactone – production by the oxidation of D-glucose with bromine water is prohibited.
- Kaolin.
- Magnesium sulfate, nonsynthetic sources only.
- Nitrogen - oil-free grades.
- Oxygen--oil-free grades.
- Perlite--for use only as a filter aid in food processing.
- Potassium chloride.
- Potassium iodide.
- Sodium bicarbonate.
- Sodium carbonate.
- Tartaric acid.
- Waxes - nonsynthetic (Carnauba wax; and Wood resin).
- Yeast - nonsynthetic, growth on petrochemical substrate and sulfite waste liquor is prohibited (Autolysate; Bakers; Brewers; Nutritional; and Smoked - nonsynthetic smoke flavoring process must be documented).

**NOP Synthetics allowed:**

- Alginates.
- Ammonium bicarbonate - for use only as a leavening agent.
- Ammonium carbonate - for use only as a leavening agent.
- Ascorbic acid.
- Calcium citrate.
- Calcium hydroxide.
- Calcium phosphates (monobasic, dibasic, and tribasic).
- Carbon dioxide.
- Cellulose - for use in regenerative casings, as an anti-caking agent (non-chlorine bleached) and filtering aid.
- Chlorine materials - disinfecting and sanitizing food contact surfaces, Except, That, residual chlorine levels in the water shall not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act (Calcium hypochlorite; Chlorine dioxide; and Sodium hypochlorite).
- Ethylene - allowed for postharvest ripening of tropical fruit and degreening of citrus.
- Ferrous sulfate - for iron enrichment or fortification of foods when required by regulation or recommended (independent organization).
- Glycerides (mono and di) - for use only in drum drying of food.
- Glycerin - produced by hydrolysis of fats and oils.
- Hydrogen peroxide.

- Lecithin - bleached.
- Magnesium carbonate - for use only in agricultural products labeled "made with organic (specified ingredients or food group(s))," prohibited in agricultural products labeled "organic."
- Magnesium chloride - derived from sea water.
- Magnesium stearate - for use only in agricultural products labeled "made with organic (specified ingredients or food group(s))," prohibited in agricultural products labeled "organic."
- Nutrient vitamins and minerals, in accordance with 21 CFR 104.20, Nutritional Quality Guidelines For Foods.
- Ozone.
- Pectin (low-methoxy).
- Phosphoric acid - cleaning of food-contact surfaces and equipment only.
- Potassium acid tartrate.
- Potassium carbonate.
- Potassium citrate.
- Potassium hydroxide - prohibited for use in lye peeling of fruits and vegetables except when used for peeling peaches during the Individually Quick Frozen (IQF) production process.
- Potassium iodide - for use only in agricultural products labeled "made with organic (specified ingredients or food group(s))," prohibited in agricultural products labeled "organic."
- Potassium phosphate - for use only in agricultural products labeled "made with organic (specified ingredients or food group(s))," prohibited in agricultural products labeled "organic."
- Potassium tartrate made from tartaric acid.
- Silicon dioxide.
- Sodium citrate.
- Sodium hydroxide - prohibited for use in lye peeling of fruits and vegetables.
- Sodium phosphates - for use only in dairy foods.
- Sulfur dioxide - for use only in wine labeled "made with organic grapes," Provided, That, total sulfite concentration does not exceed 100 ppm.
- Tartaric acid.
- Tocopherols - derived from vegetable oil when rosemary extracts are not a suitable alternative.
- Xanthan gum.

### **BDIH Positive List**

- |                                 |                                     |                             |
|---------------------------------|-------------------------------------|-----------------------------|
| • Abelmoschus<br>Moschatus      | • Alcohol                           | • Aluminium<br>Hydroxide    |
| • Abies Alba                    | • Alcohol denat.                    | • Aluminium Oxide           |
| • Abies Balsamea                | • Aleurites Fordii oil<br>Copolymer | • Aluminium<br>Stearate     |
| • Abies Grandis                 | • Aleurites<br>Moluccana            | • Aluminum Sulfate          |
| • Abies Spectabilis             | • Algae                             | • Ammonium Alum             |
| • Acacia Dealbata               | • Algin                             | • Ammonium<br>Glycyrrhizate |
| • Acetic Acid                   | • Aloe Barbadensis                  | • Ammonium<br>Sulfate       |
| • Acetum                        | • Althea Officinalis                | • Amyl cinnamal             |
| • Acetylated Lanolin<br>Alcohol | • Alumina                           | • Amylcinnamyl<br>alcohol   |
| • Achillea                      | • Aluminium /<br>Magnesium          | • Angelica                  |
| • Millefolium                   | Hydroxide                           | Archangelica                |
| • Aesculus                      | Stearate                            |                             |
| • Hippocastanum                 |                                     |                             |
| • Alanine                       |                                     |                             |

- Aniba Rosaeodora
- Anisyl alcohol
- Anthemis Nobilis
- Anthocyanins
- Anthyllis
- Vulneraria
- Aqua
- Arachidyl Alcohol
- Arachis Hypogaea
- Arctium Lappa
- Arctium Majus
- Arctostaphylos
- Uva Ursi
- Argania Spinosa
- Arginine
- Arnica Montana
- Aroma
- Artemisia
- Abrotanum
- Ascophyllum
- Nodosum Extract
- Ascorbic Acid
- Ascorbyl
- Dipalmitate
- Ascorbyl Palmitate
- Asparagopsis
- Armata Extract
- Aspergillus
- Ferment
- Astragalus
- Gummifer
- Avocado Oil
- Unsaponifiables
- (Avocado Sterols)
- Azulene
- Bambusa
- Arundinacea
- Bambusaidea
- Behenyl Alcohol
- Behenyl Beeswax
- Bellis Perennis
- Bentonite
- Benzoic Acid
- "1. Benzyl alcohol
- 2. Benzyl alcohol"
- Benzyl benzoate
- Benzyl cinnamate
- Benzyl salicylate
- beta Glucan
- Beta Vulgaris
- Beta-Carotene
- Betaine
- Betula Alba
- Bioflavonoids
- Bisabolol
- Borago Officinalis
- Boswellia Carterii
- Boswellia Sacra
- Boswellia Serrata
- Brassica
- Campestris
- Brassica
- Campestris
- (Rapeseed)
- Sterols
- Brassica
- Campestris /
- Aleurites Fordi Oil
- Polymer
- Brassica Napus
- Brassica Nigra
- Brassica Oleracea
- Italica
- Bursera
- Delpechiana
- Butter
- Butyris Lac
- Butyrospermum
- Parkii
- Butyrum
- Buxus Chinensis
- (= Simmondsia
- Chinensis)
- C12-20
- Alkylglucoside
- C14-22
- Alkylalcohol
- Caesalpinia
- Echinata
- Caffeine
- Calcium Alginate
- Calcium Ascorbate
- Calcium
- Carbonate
- Calcium Fluoride
- Calcium Lactate
- Calcium Sulfate
- Calendula
- Officinalis
- Callitris
- Intratropica
- Camelia Oleifera
- Camelia Sinensis
- Camphor
- Cananga Odorata
- Candelilla Cera
- Cannabis Sativa
- Canola
- Caprae Lac
- Caprylic / Capric /
- Stearic
- Triglyceride
- Caprylic / Capric
- Triglyceride
- Capryloyl Glycine
- Caprylyl / Capryl
- Glucoside
- Capsicum
- Frutescens
- Caramel
- Carnauba
- Carrageenan
- Carthamus
- Tinctorius
- Cassia Obovata
- Cedarwood Oil
- (Cedrus Atlantica
- Bark Oil)
- Cedrus Atlantica
- Cellulose
- Cellulose Gum
- Centaurea Cyanus
- Cera Alba
- Cera Flava
- Ceramide 3
- Ceramide 6 II
- Ceramides
- Ceratonia Siliqua
- Cerium Oxide
- Cetearyl Alcohol
- Cetearyl
- Glucoside
- Cetearyl Oliviate
- Cetearyl Wheat
- Bran Glycosides
- Cetearyl Wheat
- Straw Glycosides
- Cetraria Islandica
- Cetyl Acetate
- Cetyl Alcohol
- Cetyl Palmitate
- Cetyl Ricinoleate
- Chamaemelum
- Nobile
- Chamomilla
- Recutita
- Chitosan
- Cholesterol
- CI 73000
- CI 75100

- CI 75120 (Anatto)
- CI 75135 (Xanthophyll)
- CI 75300
- CI 75470
- CI 75810
- CI 75815
- CI 77000
- CI 77007 (Ultramarine)
- CI 77019
- CI 77163
- CI 77288
- CI 77289
- CI 77400
- CI 77491 (Iron Oxides)
- CI 77492 (Iron Hydroxides)
- CI 77499 (Iron Oxides)
- CI 77510
- CI 77742
- CI 77745
- CI 77891 (Titanium Dioxide)
- CI 77947
- Cinnamal
- Cinnamic Acid
- Cinnamomum Camphora
- Cinnamomum Cassia
- Cinnamomum Verum
- Cinnamomum Zeylanicum
- Cinnamyl alcohol
- Cistus Incanus
- Cistus Labdaniferus
- Citral
- Citral
- Citric Acid
- Citronellal
- Citronellol
- Citrus Amara
- Citrus Aurantifolia
- Citrus Aurantium
- Citrus Aurantium Dulcis
- Citrus Bergamia
- Citrus Deliciosa
- Citrus Dulcis
- Citrus Grandis
- Citrus Limonum
- Citrus Medica
- Citrus Medica Limonum
- Citrus Nobilis
- Citrus Paradisi
- Citrus Reticulata
- Citrus Sinensis
- Coco Glucoside
- Cocoglycerides
- Coconut Acid
- Coconut Alcohol
- Cocos Nucifera
- Cocoyl Glutamic Acid
- Coffea Arabica
- Colophonium
- Commiphora Gileadensis
- Commiphora Molmol
- Commiphora Myrrha
- Copper Oxide
- Coriandrum Sativum
- Corylus Avellana
- Coumarin
- Crambe Abyssinica Oil
- Crataegus Monogina
- Cucumis Sativus
- Cuminum Cyminum
- Cupressus Sempervirens
- Curcuma Longa
- Curcuma Zedoaria
- Cyanopsis Tetragonalba
- Cymbopogon Citratus
- Cymbopogon Flexuosus
- Cymbopogon Martini
- Cymbopogon Nardus
- Cymbopogon Schoenanthus
- Cymbopogon Winterianus
- Cysteine
- Daucus Carota
- Decyl Glucoside
- Decyl Cocoate
- Decyl Oleate
- Dehydro Xanthan Gum
- Dextrin Palmitate
- DHA
- DI C12-C13 Alkyl Malate
- Diacetin
- Dicalcium Phosphate Dihydrate
- Dipalmitoylhydroxy proline
- Dipotassium Glycyrrhizate
- Disodium Cocopolyglucose Citrate
- Disodium Cocopolyglucose Tartrate
- Disodium Cocoyl Glutamate
- Disodium Phosphate
- d-Limonene
- Echinacea Angustifolia
- Echinacea Pallida
- Echinacea Purpurea
- Eisen (II) Gluconat
- Elaeis Guineensis
- Eleutherococcus
- Equisetum Arvense
- Erythrose
- Escin
- Esculin
- Ethyl Linoleate
- Ethyllactate
- Eucalyptus Globulus
- Eucalyptus Radiata
- Eugenia Caryophyllus
- Eugenol

- Eugenol
- Euphrasia  
Officinalis
- Evernia  
Furfuracea Extract
- Evernia Prunastri  
Extract
- Faex
- Farnesol
- Farnesol
- Fermented Grain  
Extract
- Filipendula  
Ulmaria
- Foeniculum  
Vulgare
- Fructose
- Galactoarabinan
- Gallic Acid
- Gentiana Lutea
- Geraniol
- Geraniol
- Geranium
- Geranium  
Robertianum
- Geum Rivale
- Ginkgo Biloba
- Gluconic Acid
- Glucose
- Glucose
- Glucose  
Glutamate
- Glucose Oxidase
- Glutamic Acid
- Glycerin
- Glyceryl Caprate
- Glyceryl Caprylate
- Glyceryl Citrate
- Glyceryl Cocoate
- Glyceryl Dioleate
- Glyceryl  
Distearate
- Glyceryl Lactate
- Glyceryl Laurate
- Glyceryl Linoleate
- Glyceryl  
Linolenate
- Glyceryl Oleate
- "Glyceryl Oleate  
Citrate"
- Caprilic/Capric  
Triglyceride"
- Glyceryl Palmitate
- Glyceryl  
Ricinoleate
- Glyceryl Stearate
- Glyceryl Stearate  
Citrate
- Glyceryl Stearate  
SE
- Glyceryl/Cocoate/  
Citrate/Lactate
- Glycine
- Glycine Soja
- Glycine Soja  
Sterol
- Glycolic Acid
- Glycosphingolipids
- Glycyrrhiza Glabra
- Guaiazulene
- Haematoxylon  
Campechianum
- Hamamelis  
Virginiana
- Hectorite
- Hedera Helix
- Helianthus Annus
- Helichrysum  
Italicum
- Heliotropine
- Henna
- Hibiscus  
Sabdarriffa
- Hippophae  
Rhamnoides
- Humulus Lupulus
- Hyacinthus  
Orientalis
- Hyaluronic Acid
- Hydrated Silica
- Hydrogenated  
Castor Oil
- Hydrogenated  
Coco-Glycerides
- Hydrogenated  
Coconut Oil
- Hydrogenated  
Jojoba Oil
- Hydrogenated  
Lanolin
- Hydrogenated  
Lecithin
- Hydrogenated  
Olive Oil
- Hydrogenated  
Olive Oil  
Unsaponifiables
- Hydrogenated  
Palm Glycerides
- Hydrogenated  
Palm Glycerides  
Citrate
- Hydrogenated  
Palm Kernel  
Glycerides
- Hydrogenated  
Palm Oil
- Hydrogenated  
Vegetable Oil
- Hydrolyzed  
Beeswax
- Hydrolyzed Corn  
Starch
- Hydrolyzed Egg  
Protein
- Hydrolyzed Milk  
Protein
- Hydrolyzed Oats
- Hydrolyzed Silk
- Hydrolyzed Sweet  
Almond Protein
- Hydrolyzed Wheat  
Gluten
- Hydrolyzed Wheat  
Protein
- Hydrolyzed Wheat  
Starch
- Hydroxylated Milk  
Glycerides
- Hydroxyprolin
- Hypericum  
Perforatum
- Hyssopus  
Officinalis
- Illicium Verum
- Indigofera  
Argentea
- Indigofera  
Tinctoria
- Inositol
- Iris florentina
- Iris germanica
- Isoamyl p-  
Methoxycinnamate
- Isoeugenol
- Jasminum  
Grandiflorum
- Jasminum  
Officinale
- Jasminum  
Sambac

- Jojoba Esters
- Juglans Regia
- Juniperus Communis
- Juniperus Virginiana
- Kalanchoe Daigremontiana
- Kaolin
- Krameria Triandra
- Lac
- Lactic Acid
- Lactis Proteinum
- Lactoferrin
- Lactoperoxidase
- Lactose
- Lanolin
- Lanolin Alcohol
- Lanolin Cera
- Lauric Acid
- Lauroyl Lysine
- Laurus Nobilis
- Lauryl Alcohol
- Lauryl Glucoside
- Lauryl Lactate
- Lavandula Angustifolia
- Lavandula Hybrida
- Lavandula Latifolia
- Lavandula Officinalis
- Lawsonia Inermis
- L-Carvone
- Lecithin
- Leptospermum Scoparium
- Leptospermum Scoparium Mel
- Levulinic Acid
- Limnanthes Alba
- Linalool
- Linoleic Acid
- Lippia Citriodora
- Liquidambar Orientalis
- Lithospermum Officinale
- Lithotamnium Calcarum
- Litsea Cubeba
- Lupinus albus
- Lysolecithin
- Macadamia Ternifolia
- Magnesium Aluminium Silicate
- Magnesium Ascorbyl Phosphate
- Magnesium Carbonate
- Magnesium Lactate
- Magnesium Oxide
- Magnesium Silicate
- Magnesium Stearate
- Magnesium Sulfate
- Malachite
- Malic Acid
- Malpighia Punicifolia
- Malt Extract
- Maltodextrin
- Malva Silvestris
- Mangifera Indica
- Manihot Esculenta
- Mannitol
- Maris Sal
- Meadowfoam Delta Lactone
- Meadowfoam Estolide
- Mel
- Melaleuca Alternifolia
- Melaleuca Leucadendra
- Melaleuca Viridiflora
- Melia Azadirachta
- Melilotus Officinalis
- Melissa Officinalis
- Mentha Arvensis
- Mentha Piperita
- Mentha spicata
- Mentha Viridis
- Menthol
- Mercurialis Perennis
- Methionine
- Mica
- Michelia Champaca
- Microcrystalline Cellulose
- Mimosa Tenuiflora
- Mourera Fluvatilis
- Myrica Cerifera
- Myristic Acid
- Myristica Fragrans
- Myristyl Alcohol
- Myristyl Lactate
- Myristyl Myristate
- Myrtus Communis
- Narcissus Poeticus
- Nardostachys Jatamansi
- Nasturtium Officinale
- Nigella Sativa
- Ocimum Basilicum
- Oenothera Biennis
- Olea Europaea
- Olea Europaea (Olive) Oil Unsaponifiables
- Oleic Acid
- Oleic/Linoleic/Linolenic Polyglycerides
- Oleyl Alcohol
- Oleyl Erucate
- Oleyl Oleate
- Olibanum
- Olive Oil Unsaponifiables
- Olus
- Orbignya Oleifera
- Origanum Vulgare
- Origanum Majorana
- Ormenis Multicaulis
- Oryza Sativa
- Oryzanol
- Osmanthus Fragrans
- Ovum
- Palm Acid
- Palm Kernel Acid
- Palm Kernel Fatty Acid
- Palmitic Acid

- Palmitoyl Hydrolyzed Wheat Protein
- Panax Ginseng
- Parfum
- Passiflora Edulis
- Passiflora Incarnata
- PCA Ethyl Cocoyl Arginate
- PCA Glycerol Oleate
- Pectin
- Pelargonium Graveolens
- Persea Gratissima
- Persea Gratissima (Avocado) Oil Unsaponifiables
- Phenethyl Alcohol
- Phospholipids
- Phytic Acid
- Picea Excelsa
- Pimenta Acris
- Pimpinella Anisum
- Pine Oil (Pinus Silvestris Oil)
- Pinus (alle Arten)
- Pinus Cembra
- Pinus Laricio
- Pinus Mugo
- Pinus Pinea
- Pinus Sylvestris
- Piper Methysticum
- Piper Nigrum
- Pistacia Lentiscus
- Plantago Lanceolata
- Pogostemon Cablin
- Pogostemon Patchouli
- Polianthes Tuberosa
- Polyglyceryl\_5-Laurate
- Polyglyceryl-10 Laurate
- Polyglyceryl-10 Monolaurate
- Polyglyceryl-2 Caprate
- Polyglyceryl-2 Dipolyhydroxystearate
- Polyglyceryl-2 Laurate
- Polyglyceryl-2 Sesquioleate
- Polyglyceryl-2\_Dipolyhydroxystearate
- Polyglyceryl-3 Diisostearate
- Polyglyceryl-3 Laurate
- Polyglyceryl-3 Oleate
- Polyglyceryl-3 Palmitate
- Polyglyceryl-3 Polyricinoleate
- Polyglyceryl-3 Ricinoleate
- Polyglyceryl-3 Stearate
- Polyglyceryl-4 Caprate
- Polyglyceryl-6 Dicaprate
- Polyglyceryl-6 Distearate
- Polyglyceryl-6 Palmitate
- Pongamol
- Potassium Carbonate
- Potassium Cetyl Phosphate
- Potassium Citrate
- Potassium Cocoate
- Potassium Hydroxide
- Potassium Iodide
- Potassium Jojobate
- Potassium Lactate
- Potassium Laurate
- Potassium Myristate
- Potassium Oliviate
- Potassium Palm Kernelate
- Potassium Palmitate
- Potassium Peanutate
- Potassium Sorbate
- Potassium Stearate
- Potassium Thiocyanate
- Potentilla Erecta
- Proline
- Propolis Cera
- Propolis Wax
- Prunus Amara
- Prunus Amygdalys Dulcis
- Prunus Armeniaca
- Prunus Dulcis
- Prunus Persica
- Prunus Spinosa
- Pterocarpus Santalinus
- Pulsatilla Vulgaris
- Pyrus Cydonia
- Pyrus Malus
- Quercus
- Quillaia Saponaria
- Rapeseed Sterols
- Rhamnus Purshiana
- Rheum Palmatum
- Rhizobian Gum
- Rhus Succedanea
- Rhus Verniciflua Wax
- Ribes Nigrum
- Riboflavin
- Ricinoleic Acid
- Ricinus Communis
- Rosa Canina
- Rosa Centifolia
- Rosa Damascena
- Rosa Gallica
- Rosa Moschata
- Rose Flower Oil
- Rosmarinus Officinalis
- Royal Jelly
- Rubia Tinctorium
- Rumex Acetosella
- Ruscus Aculeatus
- Rutin
- Saccharide Hydrolysate

- Saccharide Isomerate
- Saccharose
- Salicylic Acid
- Salix Alba
- Salvia Hispanica
- Salvia Lavandulifolia
- Salvia Officinalis
- Salvia Sclarea
- Sambucus Nigra
- Santalum Album
- Saponaria Officinalis
- Sclerotium Gum
- Serica
- Sericin
- Serine
- Serine
- Sesamum Indicum
- Shellac
- Shorea Stenoptera
- Silica
- Silver
- Silver Chloride
- Silver Sulfate
- Simmondsia Californica
- Simmondsia Chinensis
- Sodium Alginate
- Sodium Beeswax
- Sodium Benzoate
- Sodium Bicarbonate
- Sodium Caproyl Lactylate
- Sodium Carbonate
- Sodium Cetearyl Sulfate
- Sodium Cetyl Sulfate
- Sodium Chloride
- Sodium Citrate
- Sodium Citronellate
- Sodium Cocoate
- Sodium Copolyglucose Tartrate
- Sodium Cocoyl Glutamate
- Sodium Cocoyl Hydrolyzed Soy Protein
- Sodium Cocoyl Hydrolyzed Wheat Protein
- Sodium Cocoyl Sulfate
- Sodium Dihydroxycetyl Phosphate
- Sodium Fluoride
- Sodium Gluconate
- Sodium Glutamate
- Sodium Hyaluronate
- Sodium Hydroxide
- Sodium Lactate
- Sodium Laurate
- Sodium Lauroyl Glutamate
- Sodium Lauroyl Lactylate
- Sodium Lauryl Sulfoacetate
- Sodium Levulinate
- Sodium Magnesium Silicate
- Sodium Metasilicate
- Sodium Monofluorophosphate
- Sodium Myristoyl Glutamate
- Sodium Oleate
- Sodium Oliviate
- Sodium Palm Kernelate
- Sodium Palmate
- Sodium Palmitate
- Sodium PCA
- Sodium Phytate
- Sodium Pyruvate
- Sodium Ricinoleate
- Sodium Rosinate
- Sodium Salicylate
- Sodium Silicate
- Sodium Stearate
- Sodium Stearoyl Lactylate
- Sodium Sulfate
- Sodium Thiosulfate
- Solanum Lycopersicum
- Solidago Virgaurea
- Solum Diatomeae
- Sorbic Acid
- Sorbitan Laurate
- Sorbitan Oleate
- Sorbitan Oliviate
- Sorbitan Oliviate
- Sorbitan Palmitate
- Sorbitan Sesquioleate
- Sorbitan Stearate
- Sorbitan Tristearate
- Sorbitol
- Sphagnum
- Sphingolipids
- Spiraea Ulmaria
- Spirulina Maxima
- Spirulina Platensis
- Squalane
- Squalene
- Stearic Acid
- Stearyl Alcohol
- Stearyl Beeswax
- Stearyl Caprylate
- Stearyl Citrate
- Stearyl Stearate
- Stevia Rebaudiana
- Styrax Benzoin
- Sucrose
- Sucrose Cocoate
- Sucrose Distearate
- Sucrose Laurate
- Sucrose Palmitate
- Sucrose Polypalmate
- Sucrose Stearate
- Sucrose Tetrastearate
- Sucrose Triacetate
- Sulfated Castor Oil
- Symphytum Officinale
- Syringa vulgaris
- Syzygium Aromaticum

- Tagetes Minuta
- Talc
- Tannic Acid
- Tapioca Starch
- Tartaric Acid
- Terpeneol
- Theobroma Cacao
- Threonine
- Thymol
- Thymus Serpyllum
- Thymus Vulgaris
- Tilia Cordata
- Titanium Dioxide
- Tocopherol
- Tocopheryl Acetate
- Tocotrienol
- Totarol
- Tricaprylin
- Triethyl Citrate
- Trifolium Pratense
- Triticum Vulgare
- Triticum Vulgare Gluten Extract
- Tropaeolum Majus
- Tyrosine
- Ubiquinone
- Undecylenoyl Glycine
- Undecylenoyl Phenylalanin
- Urtica Dioica
- Usnea Barbata
- Valeriana Celtica
- Valeriana Officinalis
- Vanilla Planifolia
- Vanillin
- Vegetable Oil
- Verbena Officinalis
- Vetiveria Zizanioides
- Viola Odorata
- Viola Tricolor
- Viscum Album
- Vitis Vinifera
- Wheat Germ Glycerides
- Wheat Germ Oil unsaponifiables
- Xanthan Gum
- Xylitol
- Yogurt
- Yucca Vera
- Zea Mays
- Zinc Acetate
- Zinc Gluconate
- Zinc Lactate
- Zinc Oxide
- Zinc Ricinoleate
- Zinc Stearate
- Zingiber Officinalis