

## Section 1

### 1.2

#### Personal Care Products Council

The scope of the Draft Standard (as defined by NSF) renders the standard confusing and its application unclear. The Federal Food, Drug, and Cosmetic Act (“FFDCA”) defines cosmetics by their intended use, as “articles intended to be rubbed, poured, sprinkled, or sprayed on, introduced into, or otherwise applied to the human body...for cleansing, beautifying, promoting attractiveness, or altering the appearance.”

However, in the Draft Standard the NSF changes the fundamental definition of cosmetic to one of end use application:

Items covered by this Standard include, but are not limited to, rinse-off and leave-on personal care and cosmetic products that are applied or used externally on any part of the body (e. g., hair, face, hands, and feet) as well as oral care and personal hygiene products.

This scope also creates internal confusion within the Draft Standard as it does not appear to comport with NSF’s (or FDA’s) definition for cosmetics.

Na True

#### ***1.1 Purpose***

*This Standard encourages participation in the manufacturing of personal care products using organically grown ingredients within the supply chain.*

This sentence should be changed to: This standard encourages participation in the manufacturing of natural personal care products using organically grown ingredients within the supply chain.

#### Rationale:

The standard does not only define the content of “organic” raw materials, but also defines "natural cosmetics" according to the definition of the manufacturing processes and raw materials allowed.