

NSF COMMENTS ~ SCOPE

1) CTFA

a. Over-the-counter

In the Draft Standard, NSF defined “over-the-counter” as: “(Of drugs and non-drugs) Sellable without a prescription and without a visit to a medical professional.” This definition is in direct conflict with FFDCA in that there is no legally recognized non-drug OTC.

REJECT. WHO CARES.

Definitions / Scope

2) CTFA

2. Draft Standard Annexes contain issues of concerns.

The Draft Standard includes information on GMPs. This is well beyond the scope of this document, is of limited utility, and appears to be written for food handling. If a standard is to reference GMP, a much more thorough treatment would be needed and should be consistent with existing international standards (i.e., ISO 22716:2007).

REJECT: WHATEVER WHO CARES.

Scope

3) CTFA

b. Section 1.2 Scope

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.

REJECT: SEEMS LIKE ANOTHER NON-ISSUE

Scope Definitions

4) NATRUE

NaTrue is therefore of the opinion that a single standard, recognised worldwide, should be developed. This set of norms would include both the definition of natural cosmetics (i.e. a ban on certain processes and ingredients), as well as a definition of organic cosmetics (the definition of how organic raw materials are included in the calculation of natural cosmetic). The initial aim would be one set of guidelines, which would cover the criteria for the following products on offer:

a) Natural cosmetics (without a set percentage requirement of organic ingredients)

REJECT: NOT APPROPRIATE TO NSF 305, BUT IS EFFECTIVELY THE CASE AS THE NPA "NATURAL STANDARD" IS MORE OR LESS THE SAME PROCESS ALLOWANCES (NO PETROCHEMICALS)

SCOPE

b) "Made with organic" natural cosmetics, which would have to contain at least 60% organic ingredients

REJECT: 70% IS THE NORM ESTABLISHED IN US.

SCOPE

c) ">95%" or "100%" organic natural cosmetics

REJECT: USDA NOP REGULATES O95 COSMETICS.

SCOPE

5) Karen Ash

Comments:

While I applaud the development of standards for organic products, I could not find two things in this that tie into the organic mindset. The first being, is the packaging organic? The oil used to make the plastic that is often not recyclable (being a 5 or 6 in the recycling triangle) plus the use of a packaging that is not made from recycled materials in itself makes it non organically friendly to me. Secondly, is the product, the whole product, unlike Bath and Body Works which states the "finished" product is not tested on animals, tested on animals? Any type of animal testing on any part of any product that is stated to be organic in nature disavows that it is truly what organic mindset is about.

I do not see anything related to either of these subjects in the testing criteria for organic products. A product could be grown perfectly but if it is tested on animals or put into a container that is not made from recycled materials or is recyclable in itself is not my type of organic product.

Proposal:

Include in the testing criteria, and the definition of organic, that the product, anywhere down the line, is not tested on animals. Nothing that is used to develop the product is tested on animals. No where no how is any animal harmed to make my product, unless of course it is an organic chicken, fish, cow, pig etc then it should be what Whole Foods does and that is follow the production of that animal from birth to death, to see it is

treated humanely. Secondly, the packaging requirement of organic products must be organic in itself, recycled materials used and recyclable products used. Period. When we get to that point, I will swallow the organic bit.

REJECT MOSTLY: WHILE CERTAINLY VERY IMPORTANT, ANIMAL TESTING AND RECYCLED PACKAGING ARE NOT “ORGANIC” PROCESS OR INGREDIENT ISSUES. HOWEVER, IN THE ANNEX, WE COULD ENCOURAGE THAT PRODUCTS SHOULD BE CERTIFIED ALONG WITH INGREDIENTS TO NOT BE ANIMAL TESTED, AND TO MAXIMIZE PCW PACKAGING CONTENT.

Scope