



TO: NSF Joint Committee on Organic Personal Care

FROM: Ray Green, Chairperson of the Joint Committee

DATE: January 19, 2015

SUBJECT: Proposed revision to NSF/ANSI 305 – *Personal Care Products Containing Organic Ingredients* (305i21r4)

Draft 4 of NSF/ANSI 305, issue 21 is being forwarded to the Joint Committee on Organic Personal Care for consideration. Please review the changes proposed to this standard and **submit your ballot by February 9, 2015** via the NSF Online Workspace (<http://standards.nsf.org>).

When adding comments, please identify the section number/name for your comment and add all comments under one comment number whenever possible. If you need additional space, please upload a word or pdf version of your comments online via the browse function.

Purpose

The purpose of this ballot is to vote and comment on proposed updates to the Scope Statement Language in NSF/ANSI 305.

Background

During the 2014 Joint Committee Meeting on Organic Personal Care, the group decided to update the scope statement based on issue paper OPC-2012-11 regarding INCI Labeling in Section 7.7. It was decided that instead of inserting regulatory details into the standard that it would be best to address regulatory requirements with a blanket statement in the scope of the standard. This would alleviate the need to address every state and country regulation within the body of the standard. This approach has been used in other NSF/ANSI standards and has been proven effective. The revised scope statement ultimately replaces section 7.7.1.

For **Revision 2**, the ballot was updated to reflect a comment submitted with a negative vote from the Joint Committee. Specifically the language was changed from:

Manufacturers shall exercise due diligence to ensure compliance with all applicable regulatory requirements, but compliance with this Standard in itself does not imply that all regulatory requirements have been met.

To:

Product compliance with NSF 305 does not ensure compliance with all applicable federal and state requirements.

For **Revision 3**, the ballot was further updated to reflect a comment submitted with a negative vote from the Council of Public Health Consultants. Specifically the language was changed from:

Product compliance with NSF 305 does not ensure compliance with all applicable federal and state requirements.

To:

Product compliance with NSF 305 does not ensure compliance with all regulatory requirements.



For **Revision 4**, the ballot was further updated to reflect a comment submitted with a negative vote from the Joint Committee. Specifically the language was changed from:

Product compliance with NSF 305 does not ensure compliance with all regulatory requirements.

To:

Product compliance with this Standard does not ensure compliance with all regulatory requirements.

Public Health Impact

The proposed changes have no negative impact on public health.

If you have any questions about the technical content of the ballot, you may contact me in care of:

A handwritten signature in black ink that reads "Ray Green".

Ray Green, Chairperson
Joint Committee on Organic Personal Care
c/o Joint Committee Secretariat
Allan Rose
NSF International
Tel: (734) 827-3817
E-mail: arose@nsf.org

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NSF/ANSI Standard for Personal Care Products

Personal Care Products Containing Organic Ingredients

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1.2 Scope

This Standard specifies materials, processes, production criteria, and conditions that shall be met in order for personal care products to make organic label and marketing claims under this Standard. This Standard intends to address products with a minimum organic content of 70% (O70).

Products intended to be labeled with organic processing claims currently defined under the USDA National Organic Program (NOP), including "100% Organic", "Organic", and "Made with Organic", are not covered by this Standard.

Items covered by this Standard include, but are not limited to: cosmetic products; rinse-off and leave-on personal care products; oral care products; and personal hygiene products. These products may be applied to or used externally on any part of the body (e.g., hair, face, hands, and feet). For the purposes of this Standard, cosmetics are considered personal care products.

This Standard does not ensure accuracy of claims specifying a product as "safer", "better" or of a specific quality.

Like USDA National Organic Program³ (NOP) regulations, this Standard includes allowances and restrictions on processes, agricultural ingredients, and methods of extraction based on the specific label claim to be made on the final product. The organic claim is a process claim, not a product claim. Testing will not necessarily determine whether or not a product is organic or meets this Standard.

Product compliance with this Standard does not ensure compliance with all regulatory requirements.

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7.7.1—Order of ingredients

~~Order of ingredients shall be labeled according to federal regulation in the jurisdiction where the product shall be sold.~~

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Rationale: At the 2014 Joint Committee Meeting on Organic Personal Care, the group decided to update the scope statement based on issue paper OPC-2012-11 regarding INCI Labeling in Section 7.7. The revised scope statement ultimately replaces section 7.7.1.