



Working for organic farming in Europe

International Federation of
Organic Agriculture Movements –
EU Regional Group

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Sabine LECRENIER

Head of Unit - Cosmetics and medical devices unit

DG SANCO, Directorate B - Consumer Affairs

1049 Brussels

RE: EUROPEAN STANDARDS for NATURAL AND ORGANIC COSMETICS

Dear Mrs Lecrenier,

I am writing you regards the European Commission intention to “adopt a list of common criteria for claims which may be used in respect of cosmetic products”, according to Article 20 of regulation (EC) No 1223/2009.

This IFOAM EU Group has a very high interest to be involved in this process of formulating criteria for claims relating to natural and organic as they relate to cosmetics. The IFOAM EU Group is the umbrella organisation of organic food and farming in Europe and represents the organic movement with more than 300 member organisations. Our membership represents the whole range of production chain from farmers, processors, retailers to consumer organisations throughout all EU member states and EFTA countries. Our membership represents also organisations that deal with organic and natural cosmetics.

The IFOAM EU Group was main stakeholder in the process of revising the organic regulation (EC) 834/2007 and its implementing rules (EC) 889/2008. We are therefore in close communication with the organic unit in DG AGRI for the revision and further development of the organic regulation.

We are aware of the recent publication of regulation (EC) No 1223/2009 of the European Parliament and of the Council (30 November 2009) on cosmetic products and of the intentions to “adopt a list of common criteria for claims which may be used in respect of cosmetic products”, according to Article 20 of that regulation.

IFOAM EU group are particularly interested in the criteria for claims relating to natural and organic as they relate to cosmetics. We believe that it is of utmost importance to maintain the authenticity of all products bearing reference to ‘organic’ and to ensure that consumer expectations to product quality and standards are met.

We believe that the Commission must take into account, as the primary input into this section of the criteria, the organic sector’s position on the implications of the word organic. The Commission should also maintain consistency with the meaning as defined by the organic regulation (EC) 834/2007 and understood by the majority of consumers. Therefore we would like to suggest to consider whether the organic claim for cosmetics could be integrated into the regulation (EC) 834/2007 which currently does not include non food products.



We are concerned that the interests of the majority of the EU cosmetic industry may not be fully in line with those of the organic sector and the consumer of organic products. We would further like to emphasize that there are already quite a number of private/national standards that regulate organic cosmetics. This must be taken into account when discussing this under regulation (EC) No 1223/2009.

Further we believe that the criteria for the use of the word natural as it relates to cosmetics has an impact on the organic sector and that criteria for natural cosmetics should include reference to organic ingredients and products where possible.

Therefore we request that DG Sanco should define a clear opportunity for the EU organic sector to assist in formulating the criteria for organic cosmetics. IFOAM EU group will be pleased to provide our expertise to assist with this process and to bring stakeholders to the discussion to assist in the development of the criteria for organic and natural cosmetics.

To move this process forward we request the opportunity for a meeting with the relevant staff from DG SANCO to discuss the mechanism for development of the Article 20 criteria as they relate to the words organic and natural and how best we can assist and to establish timescales.

Yours faithfully,

A handwritten signature in dark ink, appearing to read "Marco Schlüter". The signature is written in a cursive style on a light-colored background.

Marco Schlüter
Director

Copy to Alina Ujupan, cabinet Commissioner Ciolos; Maria-Angeles Benitez Salas, Director - Sustainability and Quality of agriculture and rural development, DG Agriculture; Jean Francois Hulot, Head of organic unit, DG Agriculture