



COSMOS-standard AISBL

Statement on the proposed Green Claims Directive.

As the voice for true natural and organic cosmetics, COSMOS-standard AISBL welcomes the European Commission's efforts to improve transparency and accountability in the green claims made to consumers. With over 250 eco-labels in Europe, only 53% of which adhere to clear requirements, and even fewer backed by third-party verification, the need for harmonization has never been more urgent. However, as the Green Claims Directive takes shape, we must address the uncertainties it creates for businesses that have long been committed to making the world a better place.

Manufacturers & brands dedicated to certified natural & organic cosmetics are suffering from the unfair competition greenwashing is making on the market as they are competing with companies who can claim almost everything without really being bothered. For these pioneers, who have dedicated themselves to meeting rigorous certification standards, the possibility of allowing unverified green claims through simplified procedure to bypass the directive's requirements undermines trust, consumer confidence, and industry progress. These risks create additional complexity for operators and companies already grappling with post-COVID inflationary pressures and geopolitical instability.

COSMOS-standard AISBL strongly urges European institutions to recognize and empower existing robust and scientifically based standards that meet accreditation requirements. These standards already provide clear definitions of what companies can produce and communicate, ensuring consumer trust while supporting third-party verified businesses, rolling out the following topics:

- Cosmetic life cycle criteria from raw material sourcing to end-of-life with strict and measurable requirements
- Reliable substantiation of natural & organic claim: Products must meet strict thresholds for natural and organic ingredients, promoting transparency, minimizing consumer confusion, and providing detailed information on the label.
- Going beyond regulatory requirements to reduce the environmental footprint by limiting the use of petrochemicals and other substances of concern: Ban on synthetic fragrances, GMOs, and petrochemical-derived ingredients.
- Environmental Sustainability: Rigorous requirements for packaging, waste management, and sustainable sourcing to minimize environmental impact.
- Third-party Certification: Mandatory independent verification of compliance to guarantee integrity and accountability.
- Traceability and Transparency: Full supply chain traceability, ensuring that all ingredients align with natural and organic standards.
- Continuous Improvement: Encouraging innovation and higher performance in natural and organic cosmetics through regular updates to certification criteria.

We trust the European Commission, Council and Parliament to reinforce the fight against greenwashing by setting a strong and robust framework for both labels & claims. Let us work together to bring clarity to the market, protect consumer trust, and support the companies that have paved the way for a sustainable future.

COSMOS-standard AISBL stands ready to contribute to this important dialogue and to uphold the values of true natural and organic cosmetics.

The COSMOS Standard has been developed at the European and international level by BDIH (Germany), COSMEBIO & ECOCERT (France), ICEA (Italy) and SOIL ASSOCIATION (UK) who are the founders of the COSMOS-standard AISBL (an international non-profit association registered in Belgium) in order to define common requirements and definitions for organic and/or natural cosmetics.

The COSMOS signature is the leading consumer guarantee for organic and natural cosmetics that both consumers, operators and any third parties can trust. To date over 36,000 products in 86 countries carry our COSMOS ORGANIC or COSMOS NATURAL signature. Over 13,400 raw materials carry our COSMOS CERTIFIED signature. Over 9,000 raw materials carry our COSMOS APPROVED signature.

The COSMOS-standard defines the criteria that companies must meet to ensure consumers that their products are genuine organic or natural cosmetics produced to the highest feasible sustainability practices.

The COSMOS-standard is guided by four core principles:

- *Promoting the use of products from organic agriculture, and respecting biodiversity.*
- *Using natural resources responsibly, and respecting the environment.*
- *Using processing and manufacturing that are clean and respectful of human health and the environment.*
- *Integrating and developing the concept of green chemistry.*

The COSMOS-standard covers in detail all aspects of the sourcing, manufacture, marketing and control of cosmetic products. Our Certification Bodies inspect each of these aspects when certifying an organic or natural product.

COSMOS-Standard AISBL continually reviews the criteria that companies must meet to ensure their products are genuine organic or natural cosmetics produced to the highest feasible sustainability practices.

In the latest version, Version 4, we have strengthened criteria and added new ones. The changes that have been implemented are the result of far-reaching internal reviews by COSMOS working groups, including external experts inputs and subject-specific surveys among companies with COSMOS certified product and ingredients. In addition, a public consultation process took place in 2021 to ensure that feedback was incorporated from the wider COSMOS network.