



TS004(GC)v07en – v. 26/02/2016

CERTIFICATION PROCESS

NATURAL AND ORGANIC COSMETICS

The aim of the present document is to describe the key steps of the certification process. This document is part of your certification contract.

The standard in force is available at <http://www.ecocert.com/en/organic-cosmetics-and-wellness> or is forwarded upon request.

This document has been completely revised, modifications do not appear.



Preamble

Ecocert Greenlife is a subsidiary of Ecocert group that was founded in 2009. It is dedicated to the control and the certification of non-food products (cosmetics, detergents, paints, home fragrances, textiles, etc.).

You have applied for certification according to **the Natural and Organic Cosmetics standard**. Thanks to this document, Ecocert Greenlife will present you the different steps for the certification of your products according to the scheme requirements.

Certification, made by an independent body, allows you to attest your conformity with certification requirements.

Certification process is a voluntary process. Each company is responsible for meeting these requirements. This certification does not replace the regulation in force and we remind you that certification granted by Ecocert Greenlife is not a certification of compliance with the regulations.



SUMMARY

- I. Definitions 5
- II. Applicable scheme 5
- III. Access to the certification 5
 - A. Scope of our service: In which case should I apply for certification?..... 5
 - B. Restrictions 6
- IV. The certification process step by step..... 6
 - A. Your certification application 6
 - 1. Composition of your certification application file 6
 - 2. Application which cannot be satisfied by Ecocert Greenlife 6
 - B. Formalization of your contract..... 7
 - 1. Production of your quotation..... 7
 - 2. What documents are included in your contract with Ecocert Greenlife?..... 7
 - 3. Formalizing your commitment..... 7
 - C. Initial evaluation 7
 - 1. Documentary evaluation and preparation of your on-site audit..... 7
 - 2. On-site audit 8
 - 3. Summary of your audit 8
 - 4. Evaluation of implemented corrective actions..... 8
 - D. Non-conformities and correction plan 9
 - 1. "Minor" non-conformities..... 9
 - 2. "Major" non-conformities..... 9
 - 3. Correction plan 9
 - E. Review of the evaluation results and certification decision 9
 - F. Certification documents.....10
 - G. Surveillance and continuation of the certification process10
 - 1. Periodic surveillance10
 - 2. Implementation of an audit plan on site11
 - 3. Follow-up of your activity11
 - 4. Summary table of the certification process steps12
 - H. Certification renewal13
 - 1. Continuation of certification under conditions13
 - 2. Suspension certification or certification on hold13
 - 3. Reduction of the certification scope13
 - 4. Withdrawal of certification13
 - I. Changes affecting certification14
 - 1. Changes in the certification scheme (new or revised requirements)14



- 2. Changes of your certification scope.....14
- 3. Postponement of your certification14
- J. End of certification.....15
 - 1. End of contract term and consequences on your certification15
 - 2. Specific cases of stock selling off and stock audit15
- V. Complaints and appeals.....15
 - A. Complaints15
 - B. Appeals.....16
 - C. Your obligations with respect to third parts claims16
- VI. Use of references to certification, to Ecocert and use of trademarks (Ecocert and others) associated to the service provided16
- Annex I: Definitions18



I. Definitions

Terms used in this document are defined in Annex I.

II. Applicable scheme

The scheme Natural and Organic Cosmetics is managed by Ecocert Greenlife. It is a private scheme.

Ecocert Greenlife is accredited for the certification according to this scheme and offers service in France and abroad in particular through its subsidiaries.

Documents of the scheme are the following ones:

- the Natural and Organic Cosmetics standard,
- the present certification process,
- the rules of reference to the certification
- the Terms and conditions

All these documents are available free on the website <http://www.ecocert.com/en/organic-cosmetics-and-wellness> or on request.

III. Access to the certification

A. Scope of our service: In which case should I apply for certification?

Beneficiaries	Obligation to commit	No obligation to commit
Distributor/ Brand owner	You are a brand owner or the person in charge of the release to market.	You are just a distributor: You sell other brands products and you are not in charge of the release to market.
Manufacturer/ Subcontractor (of raw materials or finished products)	You are in charge of the release to market of the products you manufacture And/or You manufacture products for two or more brand owners who have commitments with Ecocert.	You manufacture products on behalf of a sole brand owner (who is committed to the certification process). However, the evaluation of this activity must be realized.
Handler	Handlers do not have any commitment obligations. However, the evaluation of this activity must be realized.	
Complex and particular cases (industrial groups, superstores and supermarkets...)	We invite you to contact Ecocert to obtain information on commitment obligations.	



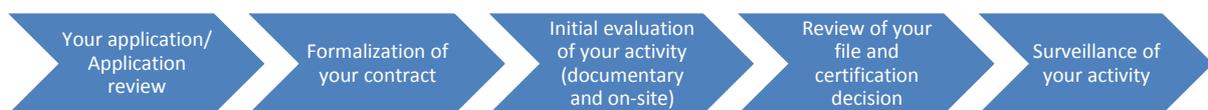
B. Restrictions

Ecocert Greenlife may refuse an application for certification when there are fundamental or known reasons such as illegal activities or repeated non-conformities of certification requirements, inappropriate behavior, outstanding payment, etc.

IV. The certification process step by step

The service is based on an annual cycle. It leads, when the certification requirements are fulfilled, to the issuance or renewal of a certificate, allowing you to market your products with a reference to the certification and/or to Ecocert and/or to Ecocert Greenlife.

The steps of the certification process are the following ones (and are detailed below):



A. Your certification application

1. Composition of your certification application file

In order to give you all the needed information to complete the certification process, we send you the following documents:

- The current version of the standard
- The pre-inquiry questionnaire and associated application forms if necessary
- This certification process (This document)

We kindly ask you to send us the completed forms in order to collect all the necessary information needed for us to do what is called "application review". The application review is the study of the feasibility and the definition of your project. Its goal is to:

- Make sure you have read all the requirements of the standard
- Ensure that all necessary information are specified in the forms
- Study the feasibility of the certification of your products

2. Application which cannot be satisfied by Ecocert Greenlife

Certification is not possible in these specific cases:

- established non-conformity with the general regulations in force on cosmetics
- a conflict of interest that could undermine the impartiality of our decisions
- a geographical location that makes certification technically impossible or risky for those involved,
- the lack of qualified personnel to meet the specific requirements of your request
- a termination of contract following a decision by Ecocert less than 3 years



B. Formalization of your contract

1. Production of your quotation

The cosmetic service, on the basis of your application, will establish a personal quote for the current year and taking your specific activity into account (manufacturer, subcontractor, brand owner, handler, other) and based on an estimate of the required working time. This quote details the documentary evaluation, on site audit(s), and finally audit report review and decision of certification. Audit, sampling or analysis, which are not planned in the evaluation plan are not included in the initial quotation.

The quotation is sent to you together with the Terms and conditions [and the fee schedule](#) within 15 days. Additional time may be required for complex cases.

2. What documents are included in your contract with Ecocert Greenlife?

The contract of certification is composed of the current versions of the following documents:

- Terms and Conditions
- This certification process
- The Natural and Organic Cosmetics standard
- The rules of reference to certification
- The quotation

3. Formalizing your commitment

Your contract is concluded upon return of the signed quotation.

By signing this quotation, you agree to the Terms and conditions including the compliance to the requirements defined in the standard.

C. Initial evaluation

During the initial evaluation, all the activities in scope of the certification will be checked in order to ensure your compliance to the standard's requirements.

1. Documentary evaluation and preparation of your on-site audit

Your file will be allocated to a certification officer, who will be your first point of contact. This officer will send you the forms needed that are specific to your activity.

These documents are reviewed by your certification officer and used to collect all necessary information for your on-site audit.

Ingredients, formulas, labels, packaging, cleaning products and communication documents making reference to Ecocert/Ecocert Greenlife have to be sent for validation before any use.

The approval on-site audit is assigned after once your application has been processed.

The auditor in charge of your audit plans with you an audit appointment. About 10 days before your audit, the auditor sends to you an audit plan and reminds you to keep documents available by sending a notification of visit.



Audit plan and these documents are defined in accordance to Ecocert procedures, according to your position in the process of development (manufacturing or distribution of the products) and others involved in process.

In order to prepare your audit, you can consult the Guide for the Preparation of the audit.

2. On-site audit

On-site audits are performed in order to check the compliance of the products with the requirements of the standard and are conducted on all sites carrying out operations on products covered by the certification: manufacturing, packaging, etc.

Ecocert Greenlife conducts audits on the basis defined inspection plan, specific to your activity (see paragraph G.2).

The audit is carried out according to the following steps:

- The opening meeting: the auditor presents the objectives and the different points to check, confirms the scope and the audit plan,
- The documentation evaluation,
- The on-site visit and interview with employees,
- The closing meeting: the auditor makes a summary of the on-site audit.

In the event of analysis, any sampling is done in the presence of you or of your representative, who signs the related documents. The nature of the analysis and the laboratory chosen to do the analysis are determined by Ecocert Greenlife.

If it is necessary, Ecocert Greenlife may decide to leave a sample in your facility. This sample should be used only in the event of counter-analysis. In this case, you, a representative of Ecocert Greenlife or a bailiff may send the sample to a third party laboratory appointed by Ecocert Greenlife according to the Ecocert Greenlife instructions. Billing terms are defined inclusively in your annual quotation, or otherwise, to real costs.

3. Summary of your audit

During the audit, non-conformities with standards requirements can be found. These non-conformities require actions (called "corrective actions") from you in order to get in compliance.

You receive at the end of the audit, the details of any non-conformity and, then, information regarding the additional evaluation tasks needed to verify that non-conformities have been corrected.

4. Evaluation of implemented corrective actions

At this point, if you express interest in continuing the certification process, you must submit corrective actions for each non-conformity in the given time. These proposed actions must be relevant and comprehensive in order to continue the certification process. Otherwise we will ask you to suggest new actions.

Depending on additional evaluation tasks needed to verify that non-conformities have been cleared, Ecocert Greenlife may be required to proceed with:

- A new on-site audit
- Further sampling and analysis,



- Additional documentary evaluation

D. Non-conformities and correction plan

During the audit, non-conformities according to the requirements of the standard can be noticed. They are classified according to 2 categories:

1. "Minor" non-conformities

A minor non-conformity is a non-conformity which does not alter the characteristics of the product to be certified. It means that it does not alter the conformity of a product towards the principles of the standard and its most important requirements (see Preface of the standard) and is not misleading for consumers.

2. "Major" non-conformities

A major non-conformity is a non-conformity which alters or may later alter the characteristics of the product to be certified. It means that it alters the conformity of a product towards the principles of the standard and its most important requirements and/or can be considered as misleading for consumers.

3. Correction plan

The correction plans lists potential non-conformities and classifies them according to their degrees of severity ("major" or "minor" non-conformity). It also identifies, for each non-conformity the consequence on the certification. Appropriate actions to be taken and application modalities are also detailed. The consequence on the certification is defined according to the nature and the severity of the non-conformity as well as its occurrence and the risk of fraud.

Appropriate measures may be (see paragraph H for details):

- Continuation of certification under conditions
- Reduction of the scope of certification
- Suspension of the certification
- Withdrawal of the certification

E. Review of the evaluation results and certification decision

The audit report and your proposed corrective actions are forwarded to your certification officer, who will ensure the relevance of the report sent. You will then receive the certification decision with the analysis results (if applicable) which is based on the correction plan defined by Ecocert Greenlife, the audit report and other related documents.

The certification officer indicates non-conformities as resolved on the basis of evidence gathered (in documents or on-site observation, when applicable) and adherence to the correction plan.

If the certification decision is positive, your certification officer will send you your certification documents.

If the certification decision is negative, your certification officer will inform you by mail and identifies the reasons. In this case, you can apply for a new certification process by going back to step A.



When necessary (for all initial on-site audits and major non-conformities), the certification officer will present the non-conformities to the certification managers to obtain their opinion, the certification decision is then put on hold.

If there are suspicions that you are marketing, or are planning to market, products that do not comply with the standard but which make reference to certification, Ecocert Greenlife may demand the provisional suspension of certification for the said products. Before taking such a certification decision, you will be informed and asked to present your own observations.

F. Certification documents

Certification documents shall only be issued after, or concurrent with, the following:

- The decision to grant the certification has been made,
- Certification requirements have been fulfilled.

These certification documents (certificate, subcontracting attestation, handling attestation) convey or permit identification of the following:

- The name and address of Ecocert Greenlife
- The certification granting date
- Your name and address
- The term of certification
- The list of your certified products (Natural or Natural and Organic cosmetics) / your controlled processes

Costs that would be incurred (eg: manufacturing, printing labels...) in anticipation of a certification decision not yet issued are under your responsibility and cannot be supported by Ecocert Greenlife.

Only the holder of the certification document can make reference to the certification on its products.

G. Surveillance and continuation of the certification process

1. Periodic surveillance

The certification process is automatically renewed every year, if you did not notify Ecocert Greenlife about the termination of your contract under conditions on current Terms and Conditions.

On the basis of any information you will send to us and/or we may collect during audit and other investigation, Ecocert Greenlife will update your annual certification fee.

During the surveillance period, we implement the surveillance plan which consists of:

- On-site audit(s) surveillance (the corrective actions defined to deal with previous non-conformities will be checked)
- Documentary checking, if modifications are implemented on documents that were checked during initial evaluation, or in case of new products to be certified
- Annual analysis plan (when applicable)



2. Implementation of an audit plan on site

The audit plan on site defines the type and the frequency of necessary audits according to your activity and some additional criteria.

Since they do not carry out any production operation, distributing entities are audited once per year.

Entities that do have production operations (except handlers) are audited twice in the first year (approval) of their application and once or twice a year thereafter. The number of audits depends on the risk analysis for the entity concerned.

Each manufacturer/subcontractor certification application is studied to determine the risks associated and thus the number of audits to be conducted per year and the overall audit time.

The following criteria are taken into consideration:

- Business type (raw materials manufacturer, make-up manufacturer, etc.)
- Number of products to be certified
- Number of ingredients used
- Seriousness of non-conformities noted the previous year
- Existing quality process within your company

Type of entities	Approval	Renewal
Brand owner/Distributor	1 audit/year	1 audit/year
Manufacturer/Subcontractor	2 audits/year	1 or 2 audits/year depending on risk analysis
Handler	1 audit/year	1 audit/year

This evaluation plan is applicable to all clients, in France and abroad. Additional and supplementary audits may be added to this plan.

In the case where the time limit for an audit is not respected, Ecocert Greenlife reserves the right to suspend your certificates, this even if the expiration date of such certificates is beyond the deadline to make the concerned audit.

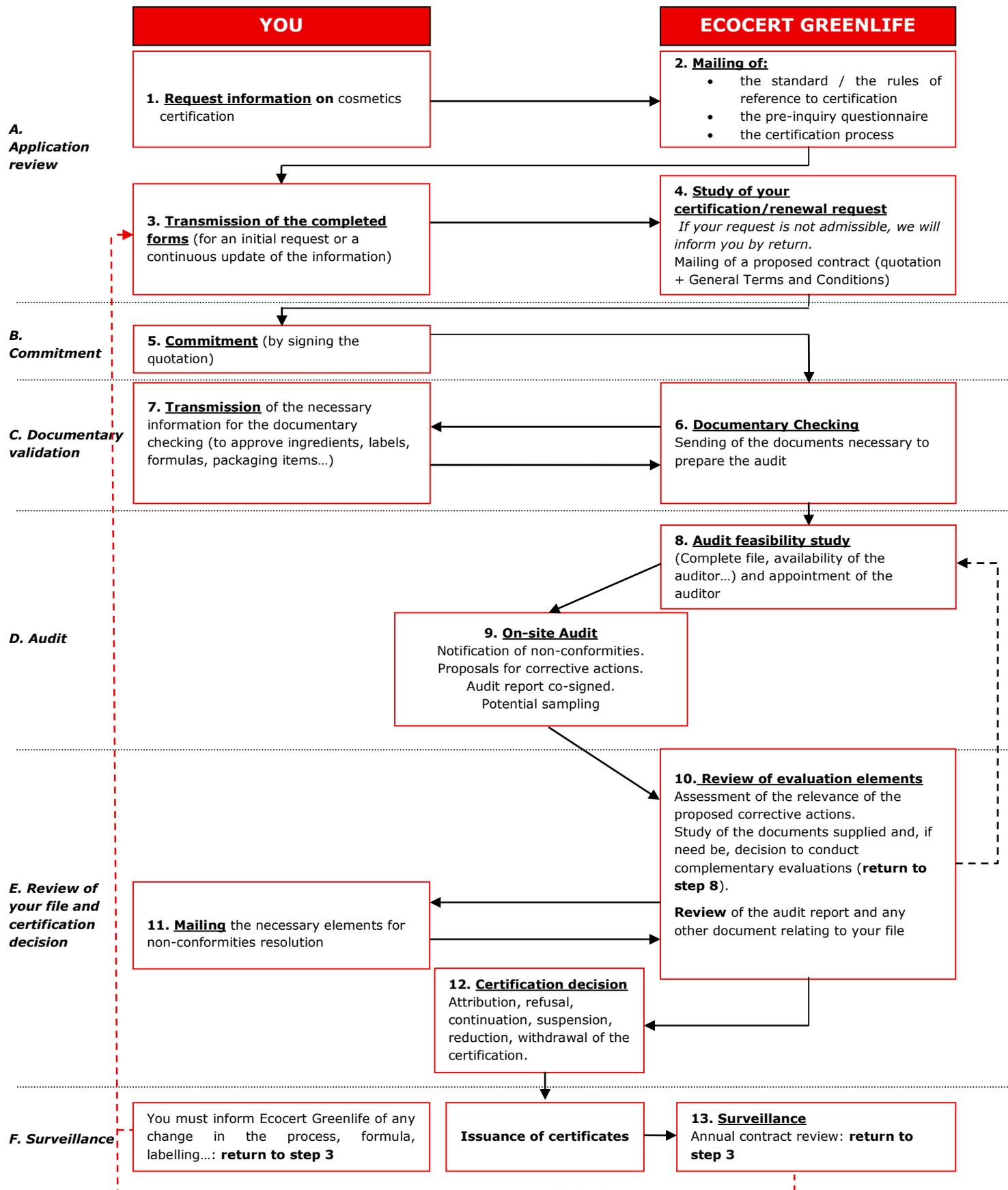
3. Follow-up of your activity

Surveillance is also based on the verification of any changes in certification requirements or the scope of your certification. For this reason, you must inform Ecocert Greenlife without any delay about any change in your system (manufacturing, process, quality) or the range of your products to be certified.

During surveillance, steps C, D, E and F below are repeated.



4. Summary table of the certification process steps



H. Certification renewal

If no non-conformity is identified during surveillance, the certification decision is granted and your certification officer will issue your new certification document.

If a non-conformity arises as a result of the surveillance or by any other means, it will be reviewed by Ecocert Greenlife and appropriate measures will be taken. Based on the correction plan and regarding the extent and severity of identified non-conformities, Ecocert Greenlife can take the following appropriate measures:

1. Continuation of certification under conditions

Conditions to continue certification may be for instance:

- Increased surveillance through new audit or additional analysis
- A delay to allow you to implement corrective actions
- Etc.

If required conditions are not fulfilled in the given time, Ecocert will start the process of suspension or withdrawal of certification and update the certification documents accordingly.

2. Suspension certification or certification on hold

This involves the interruption of certification for a specific period or until compliance of the product. If the product is not certified yet, your certificate will be on hold. Suspension may involve one or more products and/or batch. To clear such non-conformity you must provide the necessary elements within the time granted.

In all cases, reference to the certification can no longer be made for the product(s) concerned by the suspension until the non-conformity is solved. The concerned product(s) will be removed of your certification document during the suspension period.

3. Reduction of the certification scope

This implies the immediate and final cancellation of the certification for part of the products and/or batch. The products are downgraded in the conventional circuit and can no longer make reference to the certification. This decision may be due to non-conformity noticed during on-site audit or on your request if you do not wish to use the certification for one or more of your products (cancellation).

In all cases products are removed from the certificate without notice.

4. Withdrawal of certification

This implies the immediate cancellation of the certification for all your products. You can no longer make reference to the certification for any of your products.

This decision is also accompanied by the termination of the contract with Ecocert Greenlife.

A product without certificate or whose certificate has been suspended/withdrawn cannot display any reference to the certification. This ban also applies to any other communication materials.



The suspension or withdrawal of your conformity documents implies the immediate end of validity of these documents. It is your responsibility to inform your clients that your products are not certified anymore and to stop using your certification documents.

I. Changes affecting certification

1. Changes in the certification scheme (new or revised requirements)

Ecocert Greenlife undertakes to inform you by e-mail about changes to documents in the Natural and Organic cosmetics scheme, modalities of implementation and to make available the most up to date version of this scheme on the Ecocert website.

In some cases, the amended provisions will apply with immediate effect whereas in others, transitional measures may be implemented by Ecocert Greenlife.

It is your responsibility to implement changes and that of Ecocert Greenlife to check their implementation.

If changes are not implemented, Ecocert Greenlife can notify you of a non-conformity which, if not resolved, can lead to a reduction, suspension or even a withdrawal of your certification (see paragraph H).

2. Changes of your certification scope

It is also your responsibility to inform Ecocert Greenlife, without delay, of any changes that might affect your compliance to the certification requirements.

Examples of such changes can include the following:

- Legal, commercial, organizational status or ownership,
- Organization and management,
- Modifications to the product or the production method,
- Contact address and production sites,
- Etc.

The changes may have an impact on your certification (changes of the scope of the certificate, suspension, withdrawal...) and potentially lead to an additional audit (in case of new products/processes).

3. Postponement of your certification

Should you plan to suspend your activity (halt manufacture, packaging or sale of the Ecocert Greenlife certified products), we offer you the possibility to suspend our service for 1 and up to 2 semesters, with our contract remaining in force during this time. Ecocert Greenlife must be notified as soon as possible of this suspension.

Your certification documents are no longer valid during this period. You are therefore no longer allowed to manufacture or sell products with a reference to the certification nor to Ecocert/Ecocert Greenlife, regardless of the communication support (labelling, website, communication documents, etc.).

At the end of this on-hold period, the certification process is resumed at step 1 – application review, followed by an initial approval audit as for any initial application.



J. End of certification

1. End of contract term and consequences on your certification

You can ask to stop certification for all or a part of your products at any time. In case you would like to cease the certification of all your products and stop at the same time your contract, you must do so in compliance with the conditions defined under Terms and Conditions.

The end of certification for all or a part of your products, and the termination of your contract if any, implies the end of validity of your certification documents for the concerned products with immediate effect.

Consequently, after the termination date of the certification (and the termination of the contract as the case might be), you can no longer manufacture and market the concerned products making reference to certification and/or to Ecocert and/or to Ecocert Greenlife. Certification of products already distributed and still on the market is not questioned.

2. Specific cases of stock selling off and stock audit

However, if you have stocks of compliant products making reference to the certification or to Ecocert or to Ecocert Greenlife requiring a run-down period going beyond your certificate expiry date and your contract, you are asked to inform us about the estimated time to sell such stock.

Ecocert Greenlife will examine your request, and may extend your contract and allow you to sell your stock of compliant products. In that case an annual audit as a "distributor" might be required and will imply additional cost.

The contract and certificate will therefore remain in force until the date we have agreed for you to be able to sell the stocks of certified products.

In any case, we recommend you to contact Ecocert Greenlife to find out the exact termination terms and conditions applying to your organisation.

During such contract extension period, you are not allowed to manufacture new products making reference to the certification and/or to Ecocert and/or to Ecocert Greenlife.

V. Complaints and appeals

You may be asked to submit to Ecocert complaints about our services, or to appeal a certification decision taken by Ecocert.

Ecocert commits first to acknowledge receipt of your complaints and appeals and then to deal with them in a timely manner and according to our internal procedures.

A. Complaints

Anyone can send a complaint to Ecocert Greenlife. Complaints can concern documentary validation, other clients, Ecocert service...



An acknowledgement of receipt will always be sent to the complainant within 8 days. Then, an answer will be sent after approval from a person who is not involved in the complaint. All complaints are recorded by the quality manager, as well as measures taken and an analysis is made on a regular basis to improve our service.

B. Appeals

You may appeal any certification decision by sending a notice to the Cosmetics department. To be eligible, your appeal must:

- Be a written notice (letter or email),
- Be done within 15 days following the receipt of the certification decision,
- Be duly justified: new items that have not yet been brought to the attention of Ecocert Greenlife must be provided.

If the appeal is admissible, it is processed by the Cosmetics department.

If you refute the outcome of your first appeal, you can make a second appeal to the Natural and Organic Cosmetics Scheme Committee. It must be sent within 15 days of receipt of the information of the adverse decision following the first appeal.

Appeals are not suspensive of the decision subject to the appeal. These decisions therefore apply until a new decision has been made after evaluation of your appeal.

C. Your obligations with respect to third parts claims

You are responsible for managing third parts claims that are addressed to you directly. You must keep a record of all complaints related to compliance with certification requirements and make these records available to Ecocert Greenlife. These records must keep track of the appropriate actions taken and these actions must be documented.

VI. Use of references to certification, to Ecocert and use of trademarks (Ecocert and others) associated to the service provided

Conditions of references to certification, to Ecocert/Ecocert Greenlife and associated trademarks are defined in the following document: TS006(GC) - Rules of reference to certification.

Misuse of the trademark or incorrect reference to certification or to Ecocert or to Ecocert Greenlife by a client may lead to the implementation of appropriate measures such as reduction, suspension or withdrawal of certification. Ecocert Greenlife is also required to inform competent authorities.

Here are some of the cases that may arise:

- The logo seal or the reference to the certification or to Ecocert or to Ecocert Greenlife is made on products which are not compliant to certification requirements,
- The logo seal or the reference to the certification or to Ecocert or to Ecocert Greenlife is made on products which have not been the subject of an application for certification or in the process of certification,



- In general, the rules of reference to certification are not fulfilled (please read these rules in the documents available on our website or on request).

* *

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Ecocert Greenlife wishes you a good certification and remains at your disposal if you have any question:

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Annex I: Definitions

Appeal: Written request by a client to the Ecocert group for reconsideration of a certification decision the group has made.

Certification: Issuance of a certification document (see definition).

Certification document: document issued to the client attesting the conformity of products to the scheme.

Certification requirement: Specified requirement that is fulfilled by the client as a condition of establishing or maintaining certification.

Certification scheme: Set of requirements, rules and procedures defined by the scheme owner that must be implemented by the Ecocert Group.

Certification Standard: Technical document defining products requirements to be met, evaluation methods and procedures for communication on certification.

Client: Person or organization that has subscribed to a service from the Ecocert Group through the signature of a service agreement.

Complaint: Expression of dissatisfaction, other than appeals, by any person or organization to the Ecocert Group relating to the activity of the Group where a response is expected.

Correction plan: List of non-conformities related to certification requirements and their impact on the certification decision. It can be completed by any additional evaluation needed to clear non-conformities.

Corrective action: Action to clear the cause of non-conformity or other undesirable situation noticed.

Evaluation plan: Description of the number and the evaluation types needed on an evaluation cycle to grant product conformity to requirements based on the type of clients.

Non-conformity: Non-fulfilment of a requirement.

Surveillance: Repetition of the assessment, review, certification decision, according to the certification scheme, as the basis of certification maintenance.

