



TS004(GC)v04

The certification process for ECOCERT Greenlife Ecological and Organic Cosmetics

Standard in force available on <http://cosmetiques.ecocert.com> or sent on request.



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The process leading to your certification by ECOCERT Greenlife is voluntary, and ECOCERT Greenlife wishes to forge a partnership by offering you high-quality support all throughout it.

ECOCERT Greenlife's role is to check, through the certification process, whether the manufactured and/or distributed cosmetic products submitted for certification meet the standard's requirements.

I. When to apply

Business type	Need to apply	No need to apply
Distributor / Brand owner	You own the brand or are responsible for marketing the product	You are merely the distributor: You sell other brands and you are not responsible for marketing the product
Manufacturer / Subcontractor (of raw materials or finished products)	You are responsible for marketing the products you manufacture and/or You work for more than two brand owners that have applied to Ecocert	You manufacture cosmetic products on behalf of one brand owner only (that has applied for the certification process)
Consignment manufacturer	Consignment manufacturers do not need to apply. Consignment-manufacturer inspection services are charged to the relevant brand owner.	
Complex special cases (group of companies, super and hypermarkets, etc.)	You are asked to contact ECOCERT for information about the need to apply for certification	

II. The different steps in the certification process

The certification is organised on an annual cycle. If successful, it leads to either the awarding or the continuation of a licence and certificates allowing you to produce and market products that make reference to the certification and/or Ecocert.



A. Application review *(steps 1 to 4 on summary diagram p.7)*

Upon request, we will send you the following documents:

- *The latest version of the standard*
- *The preliminary questionnaire*
- *The certification process.*

Your application will be logged with our departments as soon as we receive these completed documents. ECOCERT then conducts the "application review". The purpose of this is to:

- inform you about all the requirements of the standard;
- check that all the information requested on the forms has been provided;
- study the feasibility of certification of your products on the basis of your information.

PLEASE NOTE: The certification process cannot be implemented under the following circumstances:

- Established non-compliance 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 a technical impossibility or a risk for those involved.

On the basis of your application, the certification department will establish a tailor-made annual quote, taking your specific business into account (manufacturer, subcontractor, packaging, distributor, etc.), based on an estimate of the required working time. This quote will be sent to you along with the general terms and conditions of sale, within 15 days. Additional time may be required for complex cases.

B. Commitment *(step 5 on summary diagram p.7)*

Your application is made binding by signing the quote. By signing the quote, you undertake to comply with the general terms and conditions of sale, and in particular to:

- Agree to the audits scheduled in the inspection plan and allow access to all sites, premises, data, processes, procedures and staff.
- Agree to any supplementary or additional audits (at your expense), sampling, or other investigation that ECOCERT Greenlife may deem necessary, especially in the event that product compliance is at issue.
- Inform ECOCERT Greenlife, sufficiently in advance, of any:
 - o change to your production system, your labelling or the product range to be certified;
 - o manufacturing activity of organic products that is carried out by a third party (consignment manufacturer, subcontractor) or by you, if this activity is carried out in an irregular fashion;
 - o events of which you may become aware that could affect the compliance of products certified to the ecological and organic cosmetics standard.
- Produce and market the products referring to certification and/or ECOCERT Greenlife only after receipt of the relevant licence and the certificates.



C. Documentation review *(steps 6 and 7 on summary diagram p.7)*

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 to prepare for your approval audit that are specific to your business, such as the questionnaire for approval of raw materials intended for suppliers of ingredients of natural origin.

The ingredients, formulae, planned labelling, materials used for items of packaging, cleaning products and communication materials referring to ECOCERT must be submitted to ECOCERT Greenlife for approval before being used.

Any incomplete or erroneous declaration could cause a longer auditing or certification period, and could result in increased charges.

For approval of a raw material of natural origin, your supplier has the option of contacting us directly to make use of our checking service. Under such circumstances, the raw materials are listed on our website.

D. Initial approval audit *(steps 8 and 9 on summary diagram p.7)*

Audits are conducted on all sites carrying out operations on products covered by the certification, e.g. manufacturing, packaging, etc. ECOCERT Greenlife conducts audits on the basis of a defined inspection plan, specific to your business (*see III. Inspection plan and risk analysis*).

An auditor is assigned to conduct your approval audit. Approximately ten days before the audit date, the auditor will propose an audit plan and remind you of the documents to be made available (by sending a 'notification of visit'). The audit plan and these documents are determined by virtue of ECOCERT procedures, on the basis in particular of your role in the product's development, manufacture or distribution process, and of any third parties involved in the said process.

During the audit, the auditor will check the compliance of the products with the criteria in the standard. During the audit closure meeting, you will be given a report to sign. It includes a summary of the checks carried out and any discrepancies noted. It is your responsibility to suggest your corrective actions, giving the associated implementation timeframes. These proposed remedial measures must be appropriate and comprehensive so that the certification process may continue. Should this not be the case, we will ask you to propose a new action plan. Corrective actions are typically made official during the audit closure meeting.

During audits, samples may be taken. They are then sent anonymously to one of our partner laboratories for analysis. The cost of these analyses, plus management fees, will be added to the invoice.

E. Application processing and certification decision *(steps 10 to 12 on summary diagram p.7)*

The auditor will forward the audit report and your proposed corrective actions to the certification department for examination by your certification officer. After checking the relevance and completeness of the application, the certification officer will send you the conclusions from his/her review of the report, including possible penalties relating to each discrepancy. These conclusions may be supported, if necessary, by analysis results.

When necessary and after validation by the certification manager, the certification officer will present the discrepancies to the Certification Supervisory Committee to obtain their opinion, before applying any possible penalties.

The certification officer indicates discrepancies as resolved on the basis of evidence gathered (in documents or on-site observation, as the case may be) and adherence to penalties.

Once your application is fully compliant, a licence and the certificate(s) corresponding to the compliant product(s) will be sent to you.

F. Monitoring *(step 13 on summary diagram p.7)*

In subsequent years, on the bases of an updated preliminary questionnaire (introduction to the company, list of products to be certified, list of raw materials and list of subcontractors and consignment manufacturers), ECOCERT Greenlife will update your annual quote after reviewing the application *(steps 3 and 4)*.

Important:

It is your responsibility to inform ECOCERT Greenlife of any change in the manufacture, production, composition or labelling of products and, more generally, of any event of which you may become aware that is liable to affect the compliance of your products and processes with requirements (the standard and associated documents, the contract).

To monitor certification, we implement the inspection plan which consists of various evaluation measures, e.g. in-depth audits, follow-up, additional and supplementary audits, documentation reviews, sampling for analysis, etc. Steps 6 to 12 are reiterated under this certification monitoring process. The auditor checks that the corrective actions defined to deal with previous discrepancies have been put in place and are effective.

Reminder:

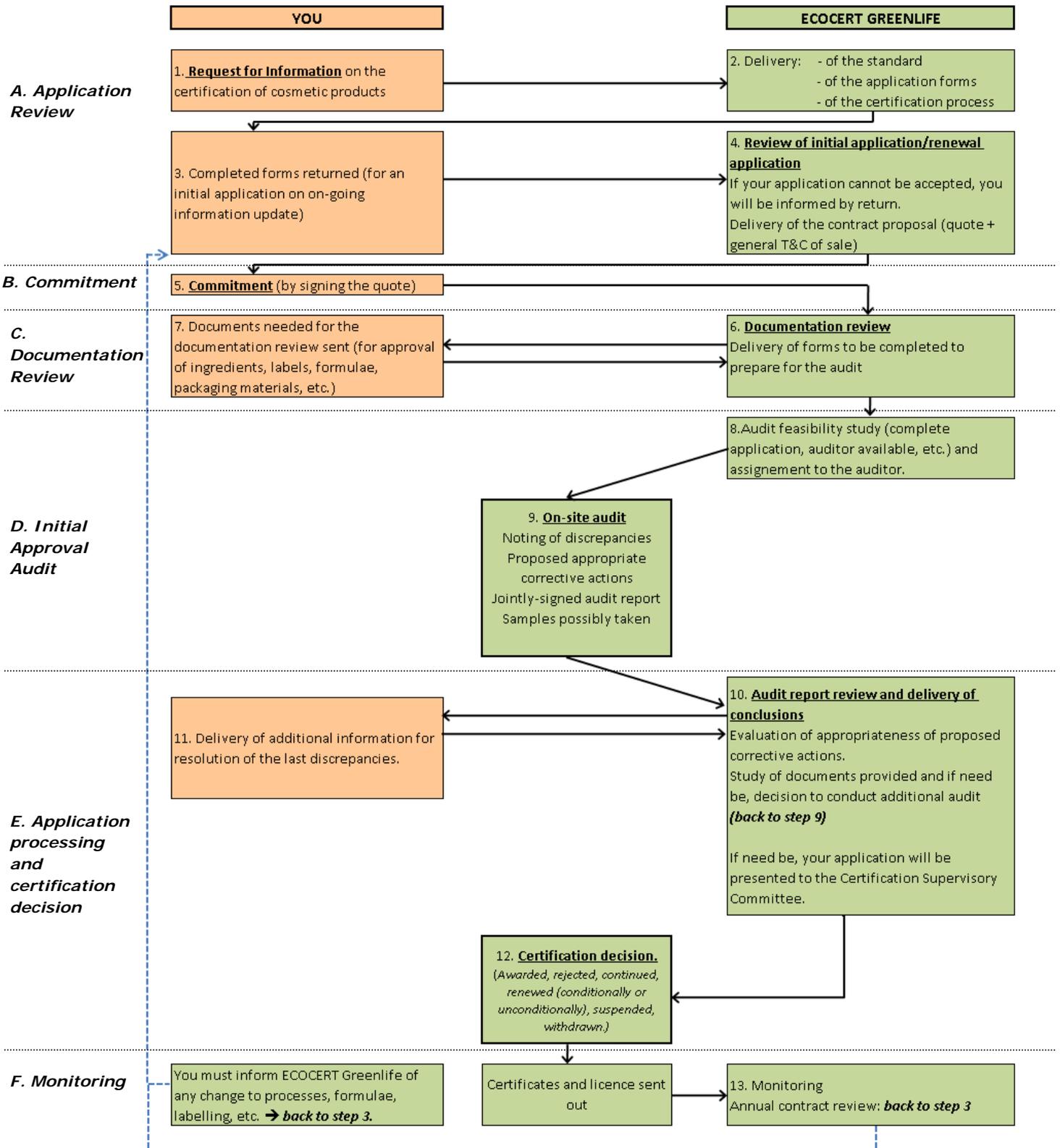
You may not manufacture your products or procure their manufacture until you have received your certificates and licence. By so doing, you render yourself liable and run the risk of the delisting of your output and withdrawal of your licence.

Likewise, you may not market your products with any reference to the certification (wording on the products, website, brochures and other materials, etc.) until you are in possession of the certificates for the products in question.

In the event of a failure to adhere to these requirements, we will be obliged to notify the relevant authorities.



Summary diagram of the steps in the certification process



III. Inspection plan and risk analysis

Distribution entities, as they have no production operations, are audited once a year.

Entities that do have production operations (except consignment manufacturers) are audited twice in the first year 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 (one or two) 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
- Number and seriousness of discrepancies noted the previous year
- Existing quality process within your company

Type of enties	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
Consignment manufacturer	1 audit/year	1 audit/year

This inspection plan concerns all the entities, in France and abroad. Additional and supplementary audits may be added to this initial inspection plan.

IV. Corrective action plan and penalties

Throughout the certification process, your certification officer will make use of the corrective action plan combined with the standard to deal with discrepancies. Each potential instance of non-compliance is listed and categorised depending on its seriousness. Any noted discrepancy will give rise to a request for corrective action, the effective implementation of which will be verified. Furthermore, depending on their seriousness, discrepancies may give rise to conditional certification or to the application of a penalty.

Whether the discrepancies were innocent or fraudulent and the notion of repeat offences will be taken into account when deciding how to resolve them.

The decision to certify a product will be taken by ECOCERT Greenlife on the basis of the information gathered throughout the certification process, and any other relevant information there may be.

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.



A. Minor discrepancies

1. Request for corrective actions

A request for corrective actions does not hinder certification of the products in question, but if effective action is not taken within the defined timescales, this may result in conditional certification or a penalty.

2. Pending certification/Conditional certification

The issue of a new certificate will be pending if awaiting the delivery of documents or the completion of an additional audit.

B. Major discrepancies

APPLICATION OF PENALTIES:

In the event of a major discrepancy, repeat offences, or accumulated discrepancies, penalties will be applied.

1. Formal demand

Compliance must be ensured within the timeframe allowed. Once this time has passed, the outcome is automatic rejection, suspension or withdrawal of the certificate or licence.

2. Refusal, suspension or withdrawal of certificate (affects products)

Certain major discrepancies (or repeat or accumulated discrepancies) may result in suspension of the certificate. The terms and conditions and the duration of suspensions will be defined in the corrective action plan or, if necessary, proposed by the Certification Supervisory Committee.

Refusal of certification equates to declining a product application for certification. Certification may only be granted after examination of an additional audit report (at the applicant's expense). In terms of certification monitoring, such discrepancies result in total or partial withdrawal of certification and the delisting of products.

A product that has had certification rejected, withdrawn or suspended cannot be marketed while making reference to the certification and/or ECOCERT Greenlife. This ban also applies to any other communication materials.

3. Refusal, suspension or withdrawal of licence (affects entire output)

Certain major discrepancies (or repeat or accumulated discrepancies) may result in suspension of the licence. The terms and conditions and the duration of licence suspension will be defined in the corrective action plan or proposed by the Certification Supervisory Committee.

A licence rejection (or initial certification rejection) equates to declining an operator's application file. Certification may only be granted after examination of an additional audit report (at the applicant's expense).

Licence withdrawal results in breach of contract and the relevant authorities will be notified.



An entity that has had its licence rejected, withdrawn or suspended cannot market products with any reference to certification and/or ECOCERT Greenlife. This ban also applies to any other communication materials.

IMPORTANT:

The suspension or withdrawal of certification documents (certificates or licences) results in the said certification documents immediately expiring. You are then obliged to return the expired documents to ECOCERT Greenlife, inform your customers that you are no longer certified and, in any event, no longer make any use of or reference to the said documents.

V. Appeals and complaints

A. Appeals

You may appeal by letter, sent to the certification department, concerning any decision on certification, within 15 days of receipt of the letter informing you of the decision. The appeal will be dealt with by the certification department as soon as it is received.

If the appeal is rejected, you may make a second appeal to the Certification Supervisory Committee. This second appeal will be billed, and must be made within 15 days of receipt of the letter informing you of the rejection of the first appeal. Applications for appeal do not suspend decisions made previously [which thus continue to apply until the appeal is decided].

B. Complaints

Anyone is able to send a complaint to ECOCERT Greenlife regarding:

- Certification of your products to the standard in question,
- The service provided by ECOCERT Greenlife or any other reason for dissatisfaction.

A response will always be sent to the individual who made the complaint.

VI. Suspension of activity

In the event that you plan to suspend your business activities (halt manufacture, packaging or sale of the ECOCERT Greenlife certified products), we offer you the option of suspending our service for one or two half-year periods, with our contract remaining in force during this time. We must be notified of this arrangement before the start of the half-year during which you wish to place your business on hold.

Your certification documents (certificates and licences) are no longer valid during this period. You are therefore no longer permitted to manufacture or sell products certified by ECOCERT Greenlife. No reference to certification wording and/or ECOCERT Greenlife is permitted, regardless of the communication materials (labelling, website, communication documents, etc.).

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

VII. End of contract

If you would like to cease certification of your products, you must notify us in writing, giving the notice stipulated in the general terms and conditions of sale. **At the end of**



the notice period, contract termination automatically results in the expiry of your contracts and licence.

As a consequence, **from that date on, you may no longer manufacture or market any product while making reference to the certification and/or ECOCERT Greenlife.**

However, in the event you have stock of compliant products making reference to the certification or to ECOCERT Greenlife, requiring a run-down period going beyond your certificate's expiry date, you are asked to inform us of the estimated time to sell such stock. ECOCERT Greenlife will examine your case, and may extend your contract and **permit you to sell off your stock of compliant products in exchange for an annual inspection as a "distributor", charged at the appropriate rate.** The contract and certificate will therefore remain in force until the date estimated to be necessary to sell stocks of certified products, by the operator or the site of initial sale (an annual stock inspection is required), it being stipulated that if you are a distributor, stocks and compliant products transferred after the initial sale (between warehousing and shops for example) within the agree timeframe, will be able to be sold off, provided they are compliant, until exhausted with no time limit.

Under all circumstances, we recommend that you contact Ecocert to find out the exact termination terms and conditions applying to your organisation.

During any such contract extension period, **you may no longer MANUFACTURE new products making reference to the certification and/or ECOCERT Greenlife.**

VIII. Certification glossary

CORRECTIVE ACTIONS: At the end of every audit, discrepancies may be noted, which are the subject of remedial measures proposed by the operator (the applicant for certification) described in the conclusions following the review of the report. The auditor and/or certification department will check the appropriateness of these proposals. The application and the effectiveness of these corrective actions are checked on the basis of documentary evidence and/or on-site observations, by the next audit at the latest.

ADDITIONAL AUDIT: Audit commissioned specifically by the certification officer, at the operator's own expense; this is necessary to demonstrate products' compliance, for example following the audit review, when resolution of discrepancies requires an onsite audit.

SUPPLEMENTARY AUDIT: Audit that is added to the certification programme, on the initiative of the certification officer or the quality department, for example following a complaint or at the suggestion of the auditor.

CERTIFICATE: Document that attests to the product's compliance with the standard and that authorises the manufacture and the sale of the said product. Unless otherwise determined by ECOCERT Greenlife, your certificate is valid until the end of the half year + one year following your in-depth audit. Renewal of the certificate depends upon the ongoing certification process concerning the operator (discrepancies noted in subsequent audits, etc.). A product for which certification has been suspended may not be marketed with any reference to the certification.



CLIENT: Any individual or legal entity that applies for certification according to the standard for Ecological and Organic Cosmetics for one or several products with a view to marketing them.

TECHNICAL COMMITTEE: The technical committee is an independent body composed of expert consultants and representatives of the profession, accredited to give a technical opinion to the certification body or supervisory committee concerning enhancements to the standards.

CERTIFICATION SUPERVISORY COMMITTEE: The committee (an independent technical body) is composed of members of several representative bodies from the industry: consumers, retailers, manufacturers, suppliers, leading qualified persons. It is responsible for overseeing the proper application of the certification process and the impartiality of the way in which ECOCERT Greenlife functions. It may be consulted to give an opinion on the files submitted by the certification department. Decisions and the application of penalties remain the responsibility of ECOCERT Greenlife.

LABELLING/INVOICE WORDING: All wording about compliance with the relevant standard must appear on the invoice (or the delivery note) and on the labelling (on the shipping document for bulk products) for any transaction involving products originating from organic agriculture and ecological and/or organic cosmetics. All communication materials (labelling, website, brochures, etc) must be submitted to ECOCERT Greenlife for approval of any references made to the Ecological and Organic Cosmetics standard and/or ECOCERT Greenlife, before distribution.

CONSIGNMENT MANUFACTURER: A third-party company, under contract with the operator, that processes and stores ingredients supplied by the brand owner (i.e. the certified operator) and invoices for the work and/or storage. As regards the products concerned, a consignment manufacturer does not buy any ingredients and does not sell any finished products to end consumers. It invoices for provision of a service. However, after approval by ECOCERT Greenlife, a consignment manufacturer may need to buy an ingredient for practical reasons.

Consignment manufacturers are inspected on behalf of and at the expense of the operator (they receive no certificate). However, a consignment manufacturer may receive a manufacturer certificate at its own expense, which confirms its compliance with the standard, regardless of the companies using its services.

SUPPLIER of natural ingredients or ingredients of natural origin: A supplier may receive, at its own expense, a certificate of compliance to the standard for its ingredients. Compliant raw materials may accordingly be listed on our website.

AGREEMENT: Proof of recognition after the initial evaluation by ECOCERT Greenlife:

- of a company's ability to meet the requirements of the standard,
- of that company's commitment to applying these standards,
- of compliance with the standard's requirements.



LICENCE: The licence certifies the Client's ability to produce, prepare, import or distribute products that comply with the Standard, regardless of the form in which the licence is provided by Ecocert Greenlife.

It is valid until the end of the current year and is automatically re-awarded the following year, provided that compliance with the standard is confirmed by the annual in-depth audit. An entity without a licence or for which the licence has been suspended may not manufacture or market any product making reference to the certification and/or ECOCERT Greenlife.

PRELIMINARY QUESTIONNAIRE: Supplied by ECOCERT Greenlife, it includes three forms to be completed: introduction to the company, list of products to be certified and list of subcontractors and consignment manufacturers. It is used to produce an eligibility report (application review) and must be updated whenever necessary.

STANDARD: Technical document defining the characteristics that a product must show (criteria or requirements), the terms and conditions of inspection for compliance with these characteristics and the terms and conditions for communication regarding the certification.

SUBCONTRACTOR: A third-party company under contract with the operator and billing for finished or semi-finished products. A subcontractor with two or more brand owners must apply in its own name to undertake the certification process.