



Bundesverband  
Naturkost Naturwaren e.V.

# ASSORTMENT GUIDELINES (SRL) for the organic specialist trade



Bundesverband Naturkost Naturwaren e.V.  
Naturkost Süd e.V.

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**Bundesverband Naturkost Naturwaren & Naturkost Süd GbR**

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## INTRODUCTION

Consumers are increasingly aware of organic products – and rightly so.

People who buy 'organic' rely on healthy food products that have been produced sustainably, appropriately for the species and without the use of chemical-synthetic pesticides. But where can you get a purely organic product assortment and, moreover, natural non-food goods that have been produced and processed according to ecological standards?

In certified shops of the organic specialist trade: Because only the shops of members of Bundesverband Naturkost Naturwaren (BNN) e.V. and Naturkost Süd e.V. guarantee to meet the justifiably high customer expectations of organic products.

The organic food and natural non-food industry is the pioneer and origin of the organic movement. It sets significantly higher standards for organic food products than the EU Organic Regulation, which defines what is organic and what is not in Europe. For this reason, the organic movement introduced the Assortment Guidelines (SRL) around 30 years ago.

In many points, these guidelines go beyond the basic requirements as set out in the European Organic Regulation, and they cover other product assortments in addition to food products. The basic idea behind all the regulations is the requirement to achieve the highest possible level of sustainability across all stages of the value chain.

Therefore, food products in the SRL do not contain any genetically modified organisms and avoid ingredients obtained from crude oil. All the SRL-compliant products are also produced and processed in an environmentally friendly manner, close to nature. The aim is always to use raw materials from certified organic farming (COF). Selected non-food segments such as laundry detergents, cleaning agents and natural cosmetics must also meet these quality requirements.

We aim to continuously develop the guidelines and expand them to include new product assortments. We achieve this with the help of the Steering Committee, which consists of retailers from both associations (Bundesverband Naturkost Naturwaren (BNN) e.V. and Naturkost Süd e.V.). The Committee is professionally supported by employees of the quality work at BNN and by external experts.

The steering committee is currently composed of the following persons: Ernst Härter (Naturkost Süd, chairman), Gunther Weiss (Alnatura, deputy chairman), Jürgen Oppen (Kraut & Rüben Bioladen), Monika Demgen (Biomarktgemeinschaft eG), Gerhard Bickel (ebl-naturkost).

The assortments of wholefood shops have voluntarily committed to complying with the SRL through membership in the Bundesverband Naturkost Naturwaren e.V. and Naturkost Süd e.V. are inspected by independent control bodies every two years.

Shops that have successfully passed the assortment inspection receive a certificate and communication materials to make this service visible to customers.

## **PREFACE – Naturkost Süd e.V.**

Naturkost Süd e.V. classes quality work, increasing competence and information to its most important tasks. As the professional association for wholefood shops in Southern Germany, we see the Assortment Guidelines primarily as an important tool to guarantee and expand the quality for which the organic specialist trade and the entire industry stand. However, the Assortment Guidelines represent more than just a quality concept. They offer customers transparency and give them binding security that a real organic product assortment is on offer in the certified specialist shop.

Bearing in mind that organic and ecologically produced foods and goods are becoming more and more popular, this exclusivity is an important distinguishing feature for consumers. Because it often takes a trained eye to distinguish between 'greenwashing' and real organic quality. The SRL offer consumers the certainty that they always have food products and goods in their hands that meet high standards and have been produced ecologically.

The Assortment Guidelines offer an important additional effect for retailers. They can sharpen their profile as a wholefood shop, and to clearly differentiate themselves from other offers with lower standards. What initially looks like an interference with their sovereignty as a retailer quickly turns out to be a clear competitive advantage for the members who have voluntarily committed themselves to comply with the guidelines.

Customers recognise the commitment and underlying principles through their purchases and in conversations with the staff. This is valued and has a positive effect on the retailer's success. The voluntary self-monitoring according to the SRL is unique in the food retail trade. It is an important guarantee that the entire organic specialist trade remains just as unique.

Ernst Härter

Executive Director  
Naturkost Süd e.V.

## **PREFACE – Bundesverband Naturkost Naturwaren e.V.**

BNN e.V. has been dedicated to promote a holistic ecological economy since 1983. We are committed to the highest quality standards and define these in the Assortment Guidelines (SRL). In this way, we combine our understanding of the special quality of organic food and natural non-food products with the aim of a holistic offer in the shops of the organic specialist trade.

This provides customers of the wholefood shop with both a unique and simple orientation aid when looking for a binding and consistently ecological offer: Everything in specialist shops is 100 percent consequent and sustainable.

We strive for a completely ecological product assortment. We never stop pursuing this goal and continuously identify current topics with the Steering Committee and develop binding guidelines with the support of technical experts.

The Assortment Guidelines guarantee the highest quality. This is because the products and brands in the certified organic and natural trade go far beyond the legal requirements.

It is a good tradition that sustainability does not begin in the shop, but rather well in advance in close cooperation between manufacturers as well as wholesalers and retailers in the BNN. The BNN Flavour Recommendation, the decision to provide a full declaration of ingredients, the Orientation Value for traces of pesticides, the strategy for reducing traces of emollients as well as many others are all additional voluntary commitments that ensure the special quality of our products.

The Assortment Guidelines are a constant innovation driver. Because they also provide orientation in the development of products. This ensures that the special quality of our products is also guaranteed in future. The Assortment Guidelines already represent the decades of commitment of those involved to the interests of the environment and consumers. The BNN promotes this commitment, for example, with the Guideline for Service Packaging, which supports the reduction of disposable materials and the promotion of reusable solutions in wholefood shop.

We will continue to develop all of this in the future with and for the organic specialist trade and always see ourselves as initiators and pioneers for sustainable ecological product assortments.

Kathrin Jäckel

Executive Director  
Bundesverband Naturkost Naturwaren (BNN) e.V.



# ASSORTMENT GUIDELINES (SRL)

## I. Food according to the EU Organic Regulation

Naturkost Süd e.V. and Bundesverband Naturkost Naturwaren e.V. promote organic farming. It is an alternative if we want to sustainably produce the basis of our daily consumption. In addition, organic farming offers numerous connecting points and synergies for further innovations, such as fair working conditions outside the European Union. The organic specialist trade represents diversity – this is not only expressed by a varied product assortment, but also by the numerous different shops that serve customers with individual support and different offers – from wholefood supermarkets to small wholefood shops.

The basis of the guidelines is a 100% organic product assortment in line with the EU Organic Regulation<sup>1</sup>: All food and pet food sold by the member shops meet these legal requirements as a minimum. Goods in conversion to organic farming are also conform to this guidelines.

According to the EU Organic Regulation, it is generally possible to manufacture conventional products with individual organic ingredients and to label them in the list of ingredients. Products such as these with <95% organic ingredients, which are not allowed to carry an EU organic label, do not meet the high quality requirements and are therefore not compliant with the SRL.

### Identification code (IK) of the organic specialist trade:

Products with <95% organic ingredients are given the code **##** (= conventional product). Products that contain game or wild fish must meet the requirements of Chapters II. 1. to 2.

With the EU Organic Regulation 2018/848, the certification of **organic salt** is possible by national standards and is therefore marked with the code **EG**. Due to expected low availabilities, non-organic salt is until further notice compliant with the SRL and is therefore marked with the code **S#**. Unless the legislator decides earlier on another regulation that increases the availability.

**Raising agents of mineral origin (carbonates and tartrates)** are additives of non-agricultural origin that are permitted for organic food products according to the EU Organic Regulation. These may also be sold as mono-products in the organic specialist trade but must be clearly marked with the following wording for the customer at the point of sale: 'not certified'. Products such as these are given the identification code of the organic specialist trade **S#** (= compliant with SRL). Transitional regulations for additives as mono-products, see Appendix.

In addition, preference is given to goods that come from producers whose quality criteria go beyond the requirements of the EU Organic Regulation. Standards of organic farming associations play a special role here. Not only because of their higher demands, but also because they created and bindingly introduced these standards before there were any legal regulations on the organic sector.

### Identification code of the organic specialist trade:

Goods that have been produced according to a standard of an organic farming association (member of BÖLW, Demeter International, BioSuisse or BioAustria) are given the code of the organic farming association.

The current list of Identification Codes (IK) is available online at: <https://n-bnn.de/leistungen-services/markt-und-produkt-daten/identifikationskuerzel>.

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<sup>1</sup> Regulation (EC) No. 2018/848 and applicable implementing regulations

## II. Food not regulated by the EU Organic Regulation

### 1. Wild-caught fish and seafood

Contributing to the protection of wild fish stocks threatened by overfishing is a major concern of these guidelines. Only sustainable fish is offered in the organic specialist trade, meaning that only fishing projects like these are promoted. In this way, the SRL make an important contribution to maintaining this source of food. Fish, algae and seafood from aquaculture as well as wild sea algae are regulated by the EU Organic Regulation and meet the requirements of this regulation as a minimum.

However, wild-caught fish is not regulated by the EU Organic Regulation. Therefore, fish and seafood that do not come from organic aquaculture must come from wild stock that is sustainably managed in accordance with these guidelines. The rules formulated here apply to fish and seafood that do not come from aquaculture but that have been caught or collected in the wild.

#### a) Wild-caught fish and wild collected seafood

##### **Proof of sustainable management of stocks**

Proof that a fish stock is sustainably managed must always be provided in two ways:

- Independent institutions such as FishBase or Fischbestände online have classified the fish species or a certain geographical origin, if necessary in connection with a certain type of extraction (catching), as acceptable.
- In addition, an independent control or certification body has provided evidence that catch and production have been carried out by the controlled/certified company in accordance with the requirements.

Because the assessment can change according to the development of fish stocks, it has been determined that: Wild-caught fish classified as 'generally acceptable' by the abovementioned institutions at the time of packing is considered to be obtained from sustainably fished stocks within the meaning of these guidelines, even if the classification of the fish species or the fish species changes after the date of catching or packaging. Appropriate inspection facilities/certifiers to guarantee traceability in the sense of these guidelines are currently:

- ASMI (Alaska Seafood Marketing Institute)
- FOS (Friend of the Sea)
- IRF (Iceland Responsible Fisheries)
- KRAV Ekonomisk Förening
- Naturland
- MSC (Marine Stewardship Council)
- Pêche Responsable

If a manufacturer or supplier of wild fish products does not want to work with any of the named certifiers, it is up to them to nominate a demonstrably competent, independent institution (preferably an inspection body) to the Steering Committee, which they would like to commission with checking compliance with the sustainability criteria. The Steering Committee reserves the right to reject unsuitable institutions. Reports or findings from approved institutions must be presented to the customer and identified in connection with the product.

### **Criteria for sustainably managed stocks**

Sustainably managed stocks of fish and seafood from wild catches or collections meet at least the following criteria:

- The size of the wild fish stock allows for a sustainable fishing yield.
- The fishing pressure exerted is so low that it does not endanger the stock.
- Young fish are not caught. Young fish should have reproduced before being caught. This requirement does not apply to animals that die after their first spawn (e.g. salmon, squid).
- No destructive fishing methods are used that generate large amounts of bycatch or destroy sensitive marine habitats. Trawls are considered a destructive fishing method. Smaller and lighter, semi-pelagic bottom otter trawls (type OTB) may be used if it is proven by competent, independent institutions that they do not have a destructive effect in the fishing area.

### **Identification code (IK) of the organic specialist trade:**

Products that meet the abovementioned conditions have the code **S#** (= compliant with SRL). The regulations also apply to mixed products with a fish/seafood component, such as paella, fish fingers, etc., whose other ingredients and labelling meet the provisions of the EU Organic Regulation.

### **b) Wild-caught fish from natural inland waters**

Fish caught in the wild from natural inland waters (freshwater) may be traded if it is obtained directly from the angler or fisherman/fisherwoman in the region, the stock is not endangered and the origin and fishing method are proven accordingly. The fish must be labelled with precise details of its regional origin.

### **Identification code (IK) of the organic specialist trade:**

Products that meet the abovementioned conditions have the code **S#** (= compliant with SRL).

### **c) Wild-caught fish and wild collected seafood from sustainable small scale and coastal fishery**

The double requirement 'certification' and 'stock assessment' could lead to a negative rating for small or coastal fishing projects, even if these types of fishing are not necessarily responsible for dwindling stocks. In addition to the standard situation (fish from larger-scale fisheries with industrial structures), it must still be demonstrated in two ways (positive assessment of the stock and the existence of certification) that a stock is sustainably managed. Small-scale fishing projects can be promoted, in which products are produced for the organic specialist trade.

Small-scale and coastal fishery means a fishery, which meets all of the following characteristics:

- Craft of less than 12 meters
- Fishing within the 12-mile zone
- Craft is not at sea for more than 24 h at a time
- Mainly stationary gear (i.e. gear that is not towed or dragged through the water) such as drift and nets, hooks and lines or trap chambers and traps is used



**Identification code (IK) of the organic specialist trade:**

Products that meet the abovementioned conditions have the code **S#** (= compliant with SRL).

**2. Wild game**

Meat and meat products from hunted game may be included in the assortment and should preferably come from the region. This should include slaughter, disjuncting and sale within a radius of 100 km - even across national borders.

If this source of supply is not possible, it must be ensured that the animal was shot in Germany and disjuncted by a certified company in Germany. In both cases, the origin must be marked accordingly on the product.

**Identification code (IK) of the organic specialist trade:**

Products that meet the abovementioned conditions have the code **S#** (= compliant with SRL). These regulations also apply to compound products with game as an ingredient with other ingredients that are produced according to the EU Organic Regulation.

**3. Food supplements and special health-oriented products**

Through wholesome nutrition<sup>2</sup> in organic quality, humans receive all the necessary nutrients in sufficient quantities and thus contribute to ensuring that there will be enough food for future generations<sup>3</sup>.

In special life situations, however, it can make sense to take selected food supplements (FS) in addition. In the organic specialist trade, you can find FS and special health-oriented products in organic quality. If organic certification is not possible due to the addition of isolated nutrients, the ingredients must be as natural as possible – controversial ingredients and processes are excluded.

**Definition and demarcation from other food products and medicinal products**

Food supplements and special health-oriented products are food that:

- are intended to supplement the general diet,
- represent a concentrate of nutrients or other substances with nutritional-specific effects alone or in combination and
- in dosed form, in particular in the form of capsules, lozenges, tablets, pills and other similar dose forms, powder sachets, liquid ampoules, drop dispensing bottles and similar dose forms of liquids and powders to be taken in measured small amounts.

In general, the classification/designation of the manufacturer applies. If they designate their products as food supplements or special health-oriented products, the corresponding regulations apply:

1. FS and health-oriented special products, the ingredients of which are 100% of agricultural origin<sup>4</sup>, must meet the requirements of the EU Organic Regulation as a minimum.

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<sup>2</sup> [www.nachhaltigeernaehrung.de/Vollwert-Ernaehrung.41.0.html](http://www.nachhaltigeernaehrung.de/Vollwert-Ernaehrung.41.0.html)

<sup>3</sup> [www.nachhaltigeernaehrung.de/Grundsaeetze.40.0.html](http://www.nachhaltigeernaehrung.de/Grundsaeetze.40.0.html)

<sup>4</sup> In line with the procedure according to the EU Organic Regulation, the proportions of water, salt and of food additives, processing aids and other products of non-agricultural origin used for the production of processed organic foods are not taken into consideration when calculating the proportions of agricultural ingredients listed in Annex V of Regulation 2021/1165.

2. FS and special health-oriented products that cannot be organically certified according to the EU Organic Regulation due to being enriched with minerals (including trace elements), vitamins, amino acids and micronutrients, must meet the following criteria:

- they must not contain any chemical-synthetic sweeteners, sugar substitutes, sugar alcohols, preservatives or flavourings,
- they must not contain any colouring or antioxidants the compounds of which do not occur naturally,
- the raw materials and the end product must not have been treated with ionising radiation,
- no hydrogenated fats, paraffins or PEGs may be used in the manufacture of the product and
- genetically modified ingredients may not be used.

A clear reference to organic ingredients is currently not permitted by law in such products. To promote organic farming, the ingredients should, of course, come from organic raw materials if possible. It is therefore recommended to give preference to food supplements from manufacturers who use organic ingredients for their products.

FS should be positioned away from the main product assortment in wholefood shops.

**Identification code (IK) of the organic specialist trade:**

Products that meet the abovementioned conditions have the code **S#** (= compliant with SRL).

The manufacturer's declaration also applies to over-the-counter/traditional medicinal products.

There are no provisions in the SRL regarding these products. A certificate of competence for the sale of over-the-counter medicinal products is mandatory by law and must be presented by the retailer.

### III. Natural non-food products

#### 1. Natural cosmetics

The sustainable food assortment in organic specialist trade is ideally complemented by certified natural cosmetic products. This is because by using predominantly plant-based ingredients and avoiding substances that are harmful to the environment and humans, natural cosmetics make an important contribution to a more sustainable world. Certified organic cosmetics also promote organic farming through ingredients from certified organic farming and thus make an even more significant contribution to environmental protection.

Near-natural cosmetics, which often only combine individual herbal ingredients with otherwise unsustainable ingredients, do not meet these requirements and therefore cannot be found in the product assortment of certified specialist retailers for good reason.

There are currently no specific legal requirements for organic and natural cosmetics. The legal provisions to protect consumers against deception and fair competition apply. In addition, private law standards define ingredients and manufacturing processes for organic and natural cosmetics and how compliance with them is checked and identified on the product.

In order to fulfil the SRL requirements, a product must meet one of the standards mentioned here and must be inspected and certified by an independent certifier.

Current recognised standards include:

- BDIH
- CCPB
- Cosmebio
- COSMOS (with the associated partner certification companies)
- Demeter
- Ecocert
- Ecogarantie
- Ecogruppo Italia
- ICADA
- Natrue
- Naturland
- NCS
- Codex Alimentarius Austriacus
- Austrian Guideline on organic production (supplementary Austrian law for organic production)
- PRO-NATURE
- Soil Association
- USDA

The approved standards are managed by independent certifiers and are constantly evolving in an ecological sense.

#### **Identification code (IK) of the organic specialist trade:**

Products that meet the abovementioned conditions bear the code **NK** for certified natural or organic cosmetics ('zertifizierte Natur- oder Bio-Kosmetik').

Transitional regulations on natural cosmetics from Syria and natural therapy-accompanying care, see Appendix.

## 2. Nail polish

Preference should be given to nail polishes that are certified according to a natural cosmetics standard recognised by the SRL.

As there are hardly any certified (coloured) nail polishes on the market at present, it should also be possible to list nail polishes that are not (yet) certified in order to ensure a comprehensive and attractive range of natural cosmetics.

In order to promote the development towards certification of further nail polishes, non-certified products traded by member shops, in contrast to nail polishes commonly found in conventional trade, must meet the following requirements:

### 1. Nail Polishes are at least free of:

- Toluene
  - Organohalogen compounds
  - Phthalates
  - Rosin
  - Camphor
  - Parabens
  - Silicones
  - Synthetic fragrances
  - Mineral oils
  - TPHP (triphenyl phosphate)
  - Ethyltosylamide
  - Polyurethane
  - Acetone
  - Xylene
  - Styrene/Acrylate copolymer
- = '15free'.

2. The formula has a minimum 80% content of natural raw materials (in line with the Index Natural Origin according to ISO 16128).
3. The products must be clearly marked with the following wording for the customer at the point of sale: 'not certified'.
4. In order to promote further developments, the manufacturers must inform the Steering Committee by 30.6. each year, without being asked, which further development steps have been implemented.

### Identification code (IK) of the organic specialist trade:

Certified nail polishes comply with the SRL for natural cosmetics and are given the code **NK**. Non-certified nail polishes that meet these above-mentioned conditions are given the code **S#** (= compliant with SRL). Other nail polishes do not comply with the SRL and are given the code **##** (= conventional product/non-certified product).

### 3. Essential oils

Essential oils are obtained from agricultural ingredients or ingredients collected from the wild. Organic farming is promoted worldwide through plants from COF for the production of essential oils.

**Essential oils include:**

- **Essential oils as cosmetic products:** In order to fulfil the SRL requirements, either a certification according to one of the cosmetic standards mentioned in the guidelines or fulfilment of the production rules of the EU Organic Regulation is necessary.  
**Identification code (IK) of the organic specialist trade:**  
Essential oils that meet these conditions have the code **NK** for certified natural cosmetics ('zertifizierte Naturkosmetik') or **EG/95-C%** resp. one of the codes of an organic farming associations for oils that comply with the EU Organic Regulation.
- **Essential oils declared as food ingredients** must be certified in accordance with the EU Organic Regulation and are given the code **EG/95-C%** or one of the codes of the organic farming associations.
- **Essential oils as commodity currently do not require a certification.** This also applies to room fragrances/emulsions and hydrosols, which consist of essential oils and carriers, and which also declare room fragrances as the intended use. Products such as these are given the code **S#**. If essential oils as commodities comply with the production rules of the EU Organic Regulation, they are given the code **EG/95-C%** or one of the codes of the organic farming associations.

The distinction and thus the need for certification must be made according to the declaration of the product (information on the label, sales description).

### 4. Laundry detergents and cleaning agents

Certified ecological laundry detergents and cleaning agents (LC) protect the environment whilst providing good cleaning performance and (skin) tolerance. Through the use of plant-based raw materials, preferably from certified organic farming, the renunciation of ecologically controversial ingredients (e.g. microplastics, phosphonates and organic halogen compounds such as chlorine) and harmful processes such as genetic engineering or animal experiments, ecological LC products make an important contribution to environmental and groundwater protection. Petroleum-based ingredients are now hardly used in certified ecological LC products any more.

There are currently no specific legal requirements for ecological LC products. The legal provisions to protect consumers against deception and for fair competition apply. In addition, private law standards define permissible ingredients and manufacturing processes and how compliance with them is checked and indicated on the product.

Besides the above criteria, certified ecological LC products for use in private households meet usually the following additional criteria:

- **Biodegradability:** All organic substances used in the product must be easily biodegradable under defined conditions. Substances that are difficult to biodegrade, such as silicone or paraffins, are not used.
- **Ingredients from certified organic farming:** In order to promote organic agriculture, ingredients from certified organic farming are used wherever possible.
- **Complete ingredients' declaration and dosage information:** In addition to legal requirements, all ingredients (even below 0.2%) are indicated on the product. Clear and

understandable dosage instructions can be found on every product, which help the consumer use the product as sparingly as possible.

These criteria and several others are regulated in detail in the following standards, which are currently recognised within the scope of the SRL for ecological LC products, and can be followed in detail there. The standards are continuously developed by the respective standard issuer.

In order to be considered compliant with the Assortment Guidelines, an organic detergent, cleaner and cleaning product must also meet all of the other requirements listed below:

**1. Product certification**

A certification by NCP, Ecogarantie or Ecocert must be available.

**2. Exclusion of petrochemicals**

Ingredients in organic WPRs should generally be free of petrochemicals. It should be noted that the following individual ingredients of petrochemical origin, for which no bio-based (in the sense of: natural origin, naturally grown) alternatives are currently available on the market, are permissible within the meaning of the Assortment Guidelines:

- **Tetraacetythylenediamine (TAED)**  
(CAS No.: 10543-57-4)
- **Ethanol Denatured**  
(CAS No.: 64-17-5)
- **Polyaspartic acid and its salts**  
(CAS No.: 617-45-8, 181828-06-8, 144538-83-0)
- **Sodium benzoate**  
(CAS No. 532-32-1)
- **Methylglycinediacetic acid trisodium salt (MGDA Na3)**  
(CAS No. 164462-16-2)

**3. Exclusion of ethoxylation**

Ethoxylated raw materials (incl. bio-based raw materials) do not meet the requirements of the SRL and are therefore considered non-compliant.

**4. Exclusion of genetically modified organisms**

Ingredients (incl. processing aids and extraction agents) are neither produced from nor by genetically modified organisms. The following applies to the enzyme origin: isolated enzymes from genetically modified microorganisms are not permitted.

The requirements described above will come into force on 01.02.2025 (note: 1.5 years after publication) and are binding for products placed on the market.

Until then, LC products that were classified as conforming to the SRLs according to the previous guidelines retain their conformity.

**Identification code (IK) of the organic specialist trade:**

Products that meet the above criteria bear the abbreviation **WP** for certified ecological LC products ('Wasch-, Putz- und Reinigungsmittel').



**Additional provisions:**

- For mineral mono-substances and organic acids that are offered and used as LC products (e.g. soda, sodium bicarbonate, citric acid, acetic acid), no certification according to one of the recognised standards above is required.
- However, organic acids must not have been produced from or by genetically modified organisms. This must be proven with appropriate evidence (e.g. COSMOS approval).
- In the case of mineral mono-substances, preference is given to natural (physically processed) substances. Substances of natural origin are accepted.

**Identification code (IK) of the organic specialist trade:**

Mineral mono-substances and organic acids that are traded and used as LC products are given the code **S#** (= compliant with SRL).

# ANNEX

## To Chapter I.

### 1. Additives as mono-products

#### a) Pectin

Pectin is a food additive of agricultural origin that, according to the EU Organic Regulation, may be used in organic products under certain conditions. As organically certified pectin was not available on the market, there was a transitional arrangement until the end of 2018 that allowed conventional pectin to be offered as a mono-product.

#### Identification code (IK) of the organic specialist trade:

Conventional pectin will be given the identification code **##** (= conventional product) and may no longer be sold in member shops.

#### b) Citric acid

Citric acid (E 330) is a food additive that, according to the EU Organic Regulation, may be used in organic products under certain conditions. Production takes place in industrial plants using biotechnology to ferment sugar-containing raw materials with the help of mould cultures. The manufacturing process explains why certified organic citric acid will not be available on the market in the foreseeable future. In order to be able to offer customers high-quality citric acid for home use in the organic specialist trade, the Steering Committee has decided on an exception for conventional citric acid as a mono-product: it may be sold until further notice.

#### Additional provisions:

- Citric acid, which may be available as a mono-product in the organic specialist trade in future, must not have been produced from or by genetically modified organisms (in line with the EU Organic Regulation).
- End and intermediate products must not have been treated with ionising radiation.
- Conventional citric acid must be labelled as 'not organically certified' in the immediate vicinity of the product in the shop (e.g. on the shelf). This labelling must be clear, legible and visible for the consumer.

#### Identification code (IK) of the organic specialist trade:

Conventionally produced citric acid that is proven to meet the abovementioned requirements will be given the code **S#** (= compliant with SRL) by the manufacturer. Citric acid that does not meet the requirements will continue to be given the code **##** (= conventional product). The manufacturer is obliged to use the correct Identification code.

## 2. Non-alcoholic wine/sparkling wine

Based on Regulation (EU) 2021/2117, the production of non-alcoholic wine/sparkling wine (hereinafter named as non-alcoholic wine) is not regulated by EU food law anymore, but by EU wine law (Regulation (EU) 1308/2013) since the 1<sup>st</sup> of January 2023. Therefore, an adaptation of the EU Organic Regulation (Regulation (EU) 2018/848) is necessary, which is expected to take place by the end of 2024. So far, a national transitional rule has been applied in Germany until the bureaucratic gap is closed with the approval of the dealcoholization process for wine production within the EU Organic Regulation. According to this rule non-alcoholic organic wine may be sold as "alkoholfreies Getränk aus Bio-Wein". Since the EU Commission has classified this transitional rule as market distortion, German inspection authorities have decided to end it. The affected products may not be labeled as organic starting from the 1<sup>st</sup> of January 2024.

In order to avoid a disadvantage in competition for organic wholefood shops, **an exemption rule applies for non-alcoholic wine (including non-alcoholic mixed wine beverages) without the organic label: If the products have been produced in accordance with the principles of the EU Organic Regulation, they may be traded until further notice. The exemption applies until the process for dealcoholization has been adapted for wine production in the EU Organic Regulation.**

### Identification code (IK) of the organic specialist trade:

Non-alcoholic wine/sparkling wine that is proven to meet the abovementioned requirements will be given the code **S#** (= compliant with SRL) by the manufacturer. Non-alcoholic wine/sparkling wine that does not meet the requirements will continue to be given the code **##** (= conventional product). The manufacturer is obliged to use the correct Identification code.

## 3. Pet food

Until now, pet food could only be labelled as organic if a nationally recognized standard was existent. Therefore, pet food couldn't be labelled with the EU-organic label but with the according national organic label. Products certified according to the national standard were given the code **EC** or **95 to C%** (=organic product, compliant with the SRL).

With the new EU Regulation (EU) 2023/2419 being in force since 30<sup>th</sup> October 2023 pet food has to be labelled along the lines of food. The EU organic logo can now be used and is obligatory for prepackaged pet food. Products that comply with the EU Organic Regulation are still marked with the code **EC** or **95 to C%** (= organic product, compliant with the SRL).

Pet food labelled with a national organic logo based on a national standard that was produced before 30<sup>th</sup> October 2023 can be sold until stocks are exhausted.

## To Chapter III.

## 1. Natural cosmetics

### a) Natural cosmetics from Syria

Due to the war in Syria, an on-site inspection by a certifier has not been possible since the end of 2011. Some natural cosmetics from Syria were therefore unable to present a valid certificate. The company Jislaine Naturkosmetik from Hamburg has applied for an exemption for soaps made in Syria which carried the Ecocert certificate for organic cosmetics until 2015. Until 31.12.2021, therefore, a transitional arrangement applied which allowed the trade of

olive oil soap and Aleppo soap natural (without additives) even without a natural cosmetics certification. In the meantime, due to the change of the certification company, a certification according to one of the standards recognised in the guidelines is again possible from 1.1.2022.

So the above-mentioned soaps in all packaging sizes can again be marked with the code **NK**. The sale of soaps whose packaging is not yet marked with the new natural cosmetics label is still possible.

### **b) Natural therapy-accompanying skin care**

In order to be able to offer customers effective cosmetics that meet the highest possible level of sustainability for therapy-accompanying care of certain skin types, the standard 'NATURE THANX' received recognition in September 2018 within the scope of the SRL. The Steering Committee has checked the content of this standard and will recognise it as temporarily compliant with the SRL until the end of 2024.

Due to the need to use active ingredients of non-natural origin, the above cosmetics require separate consideration.

Cosmetics with the NATURE THANX label meet at least the following requirements and thus guarantee a special level of sustainability within the class of active ingredient cosmetics. The basic formula fully complies with the requirements of the NCS standard (see list of recognised standards in Chapter III. 1.) for certified natural cosmetics and only the following active ingredients may be used:

- Urea (INCI)
- Panthenol (INCI), synonym: dexpanthenol, provitamin B5

This is a final positive list. Other substances will not be added.

#### **Additional provisions:**

- The products must be clearly marked with the following wording for the customer at the point of sale: 'Natural therapy-accompanying skin care, contains active ingredient(s) of non-natural origin.'
- GfAW, the standard owner of NATURE THANX, reports to the Steering Committee at regular intervals regarding the progress made in the development of naturally obtained alternatives to the four temporarily permitted active ingredients.
- By the end of 2024 at the latest, these active ingredients must be replaced by naturally obtained products and the products must meet the requirements for certified natural cosmetics fully.

#### **Identification code (IK) of the organic specialist trade:**

Products with the label of the abovementioned standard will temporarily be given the code **S#** (= compliant with SRL) until 31.12.2024. Products with an ICEA label do not comply with the SRL as of 2019 and are given the code **##** (= conventional product/non-certified product).



## Requirements for a standard recognised by the SRL

### 1. Efficient control system, oriented towards the ISO/IEC 17065 standard

- Separation of standard setter and certifier
- The independence of the auditors is guaranteed
- Standard documents are publicly accessible without cost or other effort
- Existence of a certifier's manual

### 2. Common requirements for standards in the field of organic/natural cosmetics

- Exclusion of surfactants that are not fully biodegradable (according to Regulation (EC) No 648/2004) as well as synthetic surfactants.
- Prohibition of the use of ingredients that have to be labelled as genetically modified organisms according to Regulation (EC) No. 1829/2003. This applies analogously to ingredients which do not fall within the scope of this Regulation.
- The treatment of ingredients or the finished product with ionising radiation, as well as ethoxylation, is not permitted.
- Processing/recovery methods of ingredients as well as the finished product are limited to physical as well as individual enzymatic and microbiological methods.
- The use of ingredients derived from dead vertebrate animals is not permitted.
- The use of halogen-organic and aromatic solvents is excluded.
- Exclusion of mineral oil-based raw materials (including soluble/insoluble polymers/microplastics), with the exception of a very limited number of nature-identical preservatives, which may also be made from mineral oil, to ensure sufficient product safety (positive list according to the respective standard).
- Restriction of the use of nanomaterials according to 1233/2009 (e.g. titanium dioxide, zinc oxide).
- Natural substances of vegetable, inorganic-mineral or animal origin are main ingredients. Use of natural ingredients as reaction products of natural substances is possible.
- Restriction of authorised excipients and extraction agents to natural substances.
- The use of natural minerals and mineral salts is subject to the permitted processing/extraction procedures.
- Only natural fragrances according to ISO 9235 ("Natural aromatic raw materials") are permitted as fragrances.
- Exclusion of nature-identical dyes.
- Exclusion of animal testing.
- It is assumed that the standard setter regulates the proportions of ingredients of vegetable and/or certified organic origin to be used in the formulations.

### 3. Common requirements for standards in the field of ecological laundry detergents and cleaning agents

- Exclusion of not fully biodegradable surfactants (according to Regulation (EC) No 648/2004) as well as synthetic surfactants.
- Exclusion of organic substances that are difficult to degrade aerobically and anaerobically non-degradable organic substances that are listed in the DID list of the EU EcoLabel Regulation.



- Prohibition of the use of ingredients that have to be labelled as genetically modified organisms according to Regulation (EC) No 1829/2003. This applies analogously to ingredients which do not fall within the scope of this Regulation.
- The treatment of ingredients or the finished product with ionising radiation, as well as ethoxylation, is not permitted.
- Processing/recovery methods of ingredients as well as the finished product are limited to physical as well as individual enzymatic and microbiological methods.
- The use of ingredients derived from dead vertebrate animals is not permitted.
- The use of halogen-organic and aromatic solvents is excluded.
- Exclusion of mineral oil-based raw materials (including soluble/ insoluble polymers/ microplastics), with the exception of a very limited number of nature-identical preservatives, which may also be produced from mineral oil, to ensure sufficient product safety (positive list according to the respective standard).
- Exclusion or restriction of the use of complexing agents/dispersants, denaturants and bleach activators of petrochemical origin to a minimum and/or individual product groups.
- Prohibition of quaternary ammonium compounds (QAV) and phosphates/organic phosphorus compounds.
- Ban on the use of nanomaterials according to Regulation (EU) 1233/2009.
- Natural substances of vegetable, inorganic-mineral or animal origin are to be
- be used preferentially. Use of natural ingredients as reaction products of natural substances is possible.
- Restriction of authorised excipients and extraction agents
- The use of natural minerals and mineral salts is subject to the permitted processing/extraction methods.
- Only natural fragrances according to ISO 9235 ("Natural aromatic raw materials") are permitted as fragrances.
- Exclusion of nature-identical dyes.
- Exclusion of animal testing.
- It is assumed that the standard setter regulates the proportions of ingredients of vegetable and/or certified organic origin to be used in the formulations.

## BNN Identification Codes (IK)

The list of identification codes of the Bundesverband Naturkost Naturwaren (BNN) e.V. makes it possible to provide the type of certification of a product in business-to-business communication. With the help of the list of identification codes, it becomes clear which products in the organic specialist trade meet higher requirements than those of the EU Organic Regulation, and which products meet the requirements of the SRL of the organic specialist trade associations in product categories in which there are no legal regulations.

The current list of Identification Codes (IK) is available online at: <https://n-bnn.de/leistungen-services/markt-produkt-daten/identifikationskuerzel>.

## List of abbreviations

**BNN** Bundesverband Naturkost Naturwaren e.V.

**EU Organic Regulation** Regulation (EC) No. 2018/848 and applicable implementing regulations

**COF** Certified organic farming (according to EU Organic Regulation)

**FS** Food supplements

**PEG** Polyethylene glycol

**SRL** Assortment Guidelines (Sortimentsrichtlinien)

**LC** Laundry detergents and cleaning agents

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