



# Verifying Body Care Products

# Verify Your Body Care Products

Consumers are increasingly demanding clean-label body care products and cosmetics. They want products made without harsh chemicals, without harmful additives, and without GMOs. Non-GMO Project verification is an excellent way for body care producers to demonstrate their above-and-beyond commitment to ingredient transparency.

This commitment to transparency is especially important because body care products and cosmetics are not regulated as tightly as food is in the United States and Canada. The FDA and Health Canada do not regulate terms such as “natural” or “organic” as they apply to these products. This means it is especially important for manufacturers to choose clean, non-GMO ingredients and rely on third-party testing to demonstrate their non-GMO commitment to consumers. In the body care industry, Non-GMO Project Verified is the best assurance that a product was made without biotechnology.

Verification is also beneficial to manufacturers who wish to secure shelf space in Whole Foods stores. **WFM will require** that all products making a non-GMO claim be third-party verified by 2022. GMO transparency is of key importance to both shoppers and natural product retailers; many manufacturers choose Non-GMO Project Verified in order to highlight this transparency.

**The Non-GMO Project Standard** evaluates products that are applied to the skin exactly the same way as food products, which means body care products are subject to a 0.9 percent action threshold. GMO testing, signed affidavits, and facility inspections may be required. For details about the verification process, please review the **Non-GMO Project Verification Guide**.

## GMO RISKS IN BODY CARE PRODUCTS

Genetically modified organisms and their derivatives are commonly found in body care products.

### Common GMO Risk Ingredients

Alcohol	Lecithin
Alcohols	Sodium Citrate
Amino Acids	Soy Isoflavones
Behentrimonium Chloride	Vegetable Glycerin
Citric Acid	Vegetable Protein
Corn Starch	Vitamins
Glycerin	Xanthan Gum
Lactic Acid	

## ANIMAL-DERIVED GMOS

Animal-derived inputs and ingredients are classified as high-risk due to the prevalence of GMOs in feed and forage.

### Animal-Derived Inputs in Body Care Products

Amino acids	Gelatin
Beeswax	Glycerin
Biotin	Honey
Casein/caseinate	Keratin
Collagen	Lanolin
Egg whites	Milk
Elastin	Retinol
Fish oil	Whey protein

When used as minor ingredients, major ingredients, or evaluated as products, animal-derived inputs require traceability and evaluation all the way back to the feed. The Non-GMO Project Standard requires that animals be fed a compliant, non-GMO diet. For more information on animal-derived inputs and ingredients, please review the Animal-Derived Inputs: FAQ guide.

## Micro Exemptions in Body Care

### GENETICALLY MODIFIED MICROORGANISMS

Many common body care ingredients can now be synthesized using genetically engineered microorganisms such as yeast, algae, or bacteria. These microorganisms are genetically modified so that they excrete a compound they would not usually produce, such as fragrances, proteins, and enzymes. This process (which some people call **synthetic biology**) can be achieved at an industrial scale in a fermentation tank.

Viable microorganisms are not eligible for micro exemptions; they must be evaluated and must be non-GMO. Genetically modified microorganisms and their derivatives are prohibited in Non-GMO Project Verified products.

## NBFDS

Body care products are not regulated by the USDA and are therefore not subject to the National Bioengineered Food Disclosure Standard. This law does not help consumers identify the presence of GMOs in the products they apply to their skin. However, the Non-GMO Project Standard holds personal care items to the same standard as human food, which means these products must comply with provisions in the Standard that address the NBFDS. Participants may not micro exempt anything that meets the definition of a “bioengineered food,” and participants may not micro exempt ingredients that they know to contain detectable modified genetic material.

This means that body care producers who use viable microorganisms (such as yeast, bacteria, and algae), functional enzymes, and stem cells from high-risk inputs should consult their TA. Manufacturers who use eggplant, pineapple, or apple should also be aware that these crops will become high-risk inputs on January 1, 2022.

## NAMED IN TEXT ON THE PDP

Body care producers should be aware that their labeling and marketing choices can impact a product’s evaluation. In some cases, a typically eligible input may not be micro exempted if it appears in text on the main part of a product label that consumers see when they shop. The Non-GMO Project feels it is misleading to advertise an ingredient on the front of a Non-GMO Project Verified product and then micro exempt that ingredient because a reasonable consumer would expect that ingredient to have been evaluated under the Non-GMO Project Standard. Flavors, enzymes, and microorganisms are excluded from this rule, but fragrances remain subject to it. Please review the [Named in Text on the PDP guide](#) for details, or consult a TA.

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This guide is for informational purposes only. Product evaluations are completed on a case-by-case basis; please consult a TA with specific questions about product compliance. In the event of any conflict or inconsistency between the information in this guide and the current version of the Non-GMO Project Standard and/or its associated program documents, the Non-GMO Project Standard and its associated program documents shall govern and control.

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