

Procedures and Sanctions for Non-Conformities

Information for clients – natural cosmetics programmes (NATRUE, NCS, NCP and others)

1 Purpose

This information explains how we grade findings from audits and evaluations, which deadlines apply and which measures we take when requirements are not met. All deadlines are **calendar days** and run **from the audit date**.

2 Grading of findings

Grade	Meaning	Deadline
Observation	A formal point without relevance to the certification programme, e.g. requirements arising solely from the EU Cosmetics Regulation (layout, order of INCI names, PAO).	No deadline. For your information only, not part of the certification report.
Minor non-conformity	A requirement is partly unmet; product conformity is not affected, e.g. missing or incomplete documents.	14 days
Major non-conformity	An essential requirement is unmet or the integrity of the standard is at risk, e.g. the formulation used deviates from the registered one, a non-approved raw material, inadequate traceability.	28 days
Critical non-conformity	A major non-conformity with an immediate threat to product integrity, e.g. actual use of non-compliant raw materials, deception, use of the mark without valid certification.	Immediate reaction; correction within 28 days

3 What you need to do

- You receive the non-conformities with their deadline together with the audit report. **From 01.01.2027** you find them in the **EcoControl customer portal** under “My non-conformities”; a message in the portal mailbox will then inform you of new non-conformities.
- Submit the evidence of correction on time: for minor non-conformities to the auditor, for major and critical non-conformities to EcoControl.
- When all non-conformities are closed, you receive a confirmation (from 01.01.2027 in the portal mailbox).

4 Deadlines, extension, reminders

- Deadlines are monitored by EcoControl.
- An extension of up to 28 days may be requested in writing **before the deadline expires**. EcoControl decides case by case.
- If a deadline is missed, you receive a reminder charged according to the fee schedule.
- A minor non-conformity not closed by the deadline is continued as a major non-conformity with a new deadline of 28 days.
- A major non-conformity not closed by the deadline leads to suspension of the certificate (section 7).

5 Effect on certification

- Initial certification, new products, re-certification:** while a major non-conformity is open, no certificate is granted or renewed for the products concerned.

- **Preliminary certificate:** the final certificate is issued only when all non-conformities are closed.
- **Existing certificate:** it remains in force during the deadline as long as product conformity is not at risk. For critical non-conformities EcoControl immediately considers suspension.

6 Critical non-conformities

In the case of a critical non-conformity, the auditor informs EcoControl on the day of the audit; EcoControl informs the scheme owner. You must provide without delay information on the products and quantities affected, stock levels, quantities already delivered, the root cause and your immediate measures. Critical non-conformities may lead to suspension or withdrawal of the certificate and to a recall of the products concerned.

7 Sanctions

Where a non-conformity is substantiated, EcoControl decides on the appropriate measure. Reasons are given to you in writing with reference to the requirement not met.

Measure	What it means
Continuation under conditions	Certification continues, e.g. with an additional or unannounced audit or an extended sample.
Reduction	Non-compliant products or variants are removed from the certificate.
Suspension	Certification is put on hold until the required corrections have been demonstrated. During this period you must not use the mark or refer to the certification for the products concerned. EcoControl tells you what is needed to lift the suspension and updates the certificate, the scheme owner's database and public information.
Withdrawal	Certification is ended, e.g. for serious or uncorrectable non-conformities, repeated violations, deception, refusal to cooperate or unpaid invoices. Any reference to the certification must cease.

Grounds for suspension include in particular: major non-conformities not closed on time, recurring non-conformities, knowingly false information, failure to cooperate with audits or corrections, and unpaid invoices without an agreement.

8 Recurring non-conformities

- A non-conformity is recurring where a finding from an earlier audit occurs again or the correction was not sustainable.
- A recurring minor non-conformity is graded as a major non-conformity (deadline 28 days).
- You submit a root cause analysis explaining why the earlier action was not effective and provide evidence of sustainable correction (e.g. process change, training record, internal audit).
- EcoControl may require an additional audit or an extended root cause analysis and informs the scheme owner in the case of systemic problems.

9 Appeal

You may appeal in writing against any certification decision, including suspension, reduction or withdrawal, within 4 weeks (28 days) of receipt: beschwerde@ecocontrol.online. Details: Policy for complaints and appeals.