ECOGEA Institute for quality and innovation of natural and organic products

ECOGEA PURE STANDARD FOR FOOD AND FOOD SUPPLEMENTS

Version 1.2 – July 2026

Certification scheme

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Our team

The ECOGEA team consists of professionals from the ECOGEA Institute, industry experts, and academic consultants. The professional team focuses on the certification process and works with applicants and certified members, while the academic team monitors new developments, expert articles, legislation updates, and conducts individual research projects within the Institute. All team members meet several times a year for scientific meetings to discuss ideas and adopt updates to the standards.

Access to certification and public scheme terms

The ECOGEA Pure certification scheme is open under transparent, fair and non-discriminatory terms to all traders willing and able to comply with the applicable ECOGEA requirements, irrespective of company size, country of establishment or commercial relationship with ECOGEA.

The current ECOGEA Pure Standard, certification scope, application procedure, certification agreement or Terms and Conditions, applicable fees or standardised fee methodology, independent verification procedure, complaints and appeals procedure, current label-use rules and certificate-status verification method shall be publicly available or made available upon request where publication is not technically possible.

Applications may be refused only on objectively justified grounds, including lack of legal compliance, inability to verify compliance reliably, unmanaged conflict of interest, material misrepresentation, repeated serious non-compliance, non-payment of due certification fees, or risks to persons involved in certification activities.

1. INTRODUCTION

1.1 PREFACE

This Standard defines the ECOGEA PURE voluntary certification scheme for food and food supplements. It establishes product-level requirements for legal marketability review, microbiological suitability, chemical contaminant testing, ingredient identity and origin, traceability, additive control, GMO compliance, environmental legal compliance, responsible sourcing and independently verified product integrity.

The scheme is intended to provide an accessible but rigorous route for small, micro and start-up enterprises as well as larger manufacturers and brand owners. The same technical requirements apply irrespective of company size; the depth and frequency of assessment are adjusted only through transparent risk classification.

The term “food supplement” is used in accordance with Directive 2002/46/EC. “Dietary supplement” may be used only in markets where it is the legally recognized term and where the approved claim does not mislead EU consumers.

1.2 MAIN OBJECTIVES AND PURPOSE

To establish clear and auditable requirements that can be understood and applied consistently by applicants, certifiers, laboratories and retailers.

- To combine documentary verification with independent risk-based sampling and laboratory analysis.
- To verify that product identity, origin, composition and consumer communication correspond to the certified product dossier.
- To verify compliance with applicable EU food law and relevant national requirements without replacing the legal responsibility of the food business operator.
- To provide controlled, product-specific claims that avoid absolute “free from”, safety, environmental or social guarantees.
- To align the certification scheme with the principles of ISO/IEC 17065 and ISO/IEC 17067 and to use competent laboratories operating under ISO/IEC 17025.

RECOMMENDED STANDARD DESCRIPTION

ECOGEA PURE is independent third-party product certification based on documented legal and technical review, ingredient traceability, risk-based supply-chain assessment, controlled sampling and laboratory testing by competent laboratories.

The words “guarantee”, “institutionally approved”, “government verified”, “zero contaminants”, “100% safe” and equivalent absolute expressions shall not be used unless a separate legal basis and evidence specifically permit them. The preferred wording is “independently certified”, “independently verified” or “verified within the scope of the ECOGEA PURE Standard”.

1.3 SCHEME OWNERSHIP AND STANDARD DEVELOPMENT

ECOGEA Institute is the owner of the ECOGEA PURE certification scheme and this Standard. Requirements shall be developed, reviewed and revised through documented consultation with relevant experts and stakeholders, including food-law specialists, food technologists, microbiologists, analytical chemists, toxicologists, conformity-assessment specialists, manufacturers, suppliers, retailers, consumer representatives, environmental specialists, responsible-sourcing specialists and academic representatives.

Material comments, conflict-of-interest declarations, technical interpretations and revision decisions shall be recorded. The Standard shall be reviewed at least every two years and sooner when legal, scientific or technical developments require amendment.

1.4 ANTI-MISLEADING AND ANTI-GREENWASHING RULE

ECOGEA PURE certification verifies the requirements expressly defined in this Standard. It shall not be used to imply lifecycle environmental superiority, climate neutrality, zero environmental impact, organic status, medicinal efficacy, disease prevention, universal ethical superiority or company-wide certification unless a separate, applicable and lawfully substantiated certification or claim covers that exact matter.

The ECOGEA PURE label certifies an identified product and certification scope, not the certificate holder as a whole. Certification of one product shall not be presented as certification of an entire brand, product range, factory or supply chain.

1.5 COPYRIGHT

1.6 REVISION

This standard is developing together with industry of organic and natural products. It means that it is ongoing live process, therefore subject to periodic review and amendments.

Current version: 1.2 Date 27.7.2026

2. SCOPE, PRODUCT CATEGORIES AND EXCLUSIONS

2.1 ELIGIBLE PRODUCTS

Subject to successful assessment, the following prepacked products intended for the EU market may be certified:

Code	Product category	Typical scope and specific note
P1	Tablets, hard capsules and similar solid supplements	Vitamin, mineral, amino-acid and other stable solid-dose food supplements.
P2	Softgels, gummies, lozenges and chewables	Water activity, preservation and microbiological category shall be demonstrated; gummies are not automatically treated as low-water-activity products.
P3	Powdered supplements and drink powders	Protein, electrolyte, meal, botanical and instant preparations; reconstitution instructions and post-opening conditions are considered.
P4	Botanical and herbal products	Dried botanicals, herbs, teas, spices, mushrooms, extracts and concentrated plant preparations; enhanced identity and contaminant controls normally apply.
P5	Oils and lipid products	Edible oils, omega oils, oil blends and oil-filled capsules; oxidation, authenticity and packaging protection are considered.
P6	Shelf-stable liquid supplements and syrups	Accepted only where shelf stability, preservation and microbiological safety are substantiated.
P7	Probiotics and products with intentional viable cultures	Separate strain identity, viable-count and pathogen provisions apply.
P8	Conventional shelf-stable foods	Accepted where a category-specific legal and technical test plan is approved before certification.
P9	Ingredients and raw materials	B2B certification may be granted under an applicable ingredient specification; certification does not automatically extend to finished products.
P10	Other products under an approved specification	Accepted only after ECOGEA adopts a product-specific technical specification and confirms competent assessment resources.

- food supplements in solid form, including tablets, capsules, softgels, sachets, lozenges and gummies;
- food supplements in powder, granulate, oil, syrup, drop or other stable liquid form;
- botanical and herbal preparations, teas, spices, dried plant products and superfood powders;
- oils, fats and other stable lipid products;
- conventional shelf-stable foods where the applicable product annex and test plan have been approved;
- probiotic or fermented supplements subject to the special live-microorganism provisions of this Standard.

2.2 CERTIFICATION UNIT

Certification is product-specific. The certification unit is the exact product formulation, product name, dosage form, relevant pack format, manufacturing site or sites, brand owner, intended markets and approved claims stated in the certificate. A certificate may list several products, but conformity is evaluated and recorded for each product or approved product family.

2.3 INGREDIENT AND RAW-MATERIAL CERTIFICATION

Ingredient or raw-material certification may be granted where ECOGEA has approved an applicable technical specification. The certificate shall identify the exact material, grade, manufacturer, site, origin, specification and permitted claims. Certification of an ingredient does not automatically certify a finished product containing it.

2.4 EXCLUSIONS AND RESTRICTED ACCEPTANCE

The following are outside the initial scope unless ECOGEA adopts a specific technical annex and confirms competent assessment resources:

- medicinal products, medical devices and products presented as treating or preventing disease;
- feed, pet food and veterinary products;
- infant formula, follow-on formula, foods for special medical purposes and foods intended exclusively for infants or young children;
- fresh, chilled, frozen or high-moisture ready-to-eat foods requiring a dedicated microbiological sampling plan;
- unpackaged food, restaurant meals and catering services;
- alcoholic beverages where national or sector-specific restrictions make certification or claims unsuitable;
- products containing an unauthorized novel food, unauthorized GMO, illegal substance or ingredient whose legal status cannot be verified.

2.5 GEOGRAPHICAL SCOPE

The normative legal baseline is European Union food law. Products placed on the market in a Member State shall also comply with applicable national requirements, including notification or registration of food supplements, national maximum levels, botanical lists, language rules and enforcement practice. For non-EU markets, additional market-specific review is required and shall not weaken EU baseline requirements.

3. DEFINITIONS AND NORMATIVE LANGUAGE

3.1 NORMATIVE VERBS

Term	Meaning
shall	A mandatory requirement for certification.
shall not	A prohibition.
should	A recommended practice; deviation requires consideration but does not automatically prevent certification.
may	A permitted option.
can	A statement of possibility or capability.

3.2 DEFINED TERMS

Term	Definition
Applicant	The legal person applying for certification.
Certificate holder	The legal person named on a valid ECOGEA PURE certificate and responsible for authorized label use.
Certified product	The exact product and scope listed on a valid, non-suspended ECOGEA PURE certificate.
Certification body / certifier	The independent body or appointed independent decision function responsible for evaluation and certification decisions under the ECOGEA scheme.
Scheme owner	ECOGEA Institute, which owns and maintains the Standard, certification scheme and label.
Food business operator	The natural or legal person responsible for ensuring that food-law requirements are met within the food business under their control.
Food supplement	A food as defined by Directive 2002/46/EC, intended to supplement the normal diet and marketed in dose form.
Batch / lot	An identifiable quantity produced under substantially the same conditions and assigned a unique code.
Product family	A group of products approved for sampling or assessment grouping because they share the same manufacturing site, process, dosage form, hazard profile and substantially similar ingredients.

Term	Definition
Independent sample	A sample selected by, witnessed by or obtained under the control of ECOGEA or its appointed independent verifier, rather than selected solely at the applicant's discretion.
Representative sample	A sample whose selection, units, lot and handling are suitable for the assessment purpose.
Not detected	The analyte was not detected at or above the stated method detection or reporting limit. It does not mean absolute zero.
Problematic additive	An additive, carrier, excipient or processing aid that is illegal, outside authorized conditions, fails purity requirements, is prohibited by the PURE Additive Policy, or is restricted and lacks an accepted technical justification.
High-risk ingredient	An ingredient with elevated safety, authenticity, pesticide, contaminant, GMO, environmental, labor or fraud risk due to its nature, origin, processing or supply chain.
Critical non-conformity	A non-conformity presenting a serious legal, food-safety, fraud, human-rights or certification-integrity risk requiring refusal, immediate suspension or withdrawal.
Surveillance	The planned or triggered activities used to confirm continued conformity during the certificate period.

4. CERTIFICATION PRINCIPLES AND VERIFIED PILLARS

4.1 MANDATORY CERTIFICATION PILLARS

Every ECOGEA PURE certified product shall meet all applicable requirements of the following pillars. A requirement may be recorded as not applicable only where the Standard expressly permits a justified non-applicability decision.

Pillar	Required certification outcome
1. Microbiological suitability	Applicable legal microbiological criteria and the relevant PURE category criteria are met using defined reference or validated equivalent methods.
2. Chemical contaminants	Pesticides, heavy metals and other risk-relevant contaminants are evaluated and tested against applicable legal limits and PURE requirements.
3. Ingredient origin and traceability	The identity, supplier, manufacturer, country of production and relevant agricultural origin of ingredients are documented and traceable.
4. Additive control	All additives, carriers, excipients and relevant processing aids are authorized, disclosed to the certifier and comply with the PURE Additive Policy.
5. Environmental legal compliance	Relevant production and packing sites maintain an applicable environmental legal register and evidence of permits, waste, wastewater, emissions and packaging compliance.
6. Responsible and fair sourcing	Suppliers and relevant raw-material chains comply with the mandatory Responsible and Fair Sourcing Code; stronger fair-trade claims require the enhanced criteria.
7. GMO compliance	There is no intentional use of GM ingredients, no unauthorized GMO detected above validated capability, and authorized adventitious presence is controlled under the stricter PURE action rules.
8. Identity and active content	Product and ingredient identity and declared active or marker content are independently verified according to a risk-based plan.
9. Adulteration and food-fraud control	A documented vulnerability assessment addresses substitution, dilution, undeclared actives, false origin and certificate manipulation.
10. Allergens, label and claims	The product label, allergens, mandatory warnings, origin statements and nutrition/health claims comply with applicable law.

Pillar	Required certification outcome
11. Stability and packaging	The product remains within safety and declared-quality specifications throughout shelf life and its packaging is suitable and legally compliant.

4.2 NO PARTIAL PURE CERTIFICATION

The consumer-facing ECOGEA PURE label shall not be granted for only selected pillars. A separate business-to-business verification statement may describe a limited assessment, but it shall not use the ECOGEA PURE certification label or create the impression of full certification.

5. APPLICABLE LAW AND HIERARCHY OF REQUIREMENTS

5.1 MANDATORY LEGAL COMPLIANCE

Certification shall be refused, suspended or withdrawn where the product is not lawfully marketable in the intended market. Legal compliance is a prerequisite and does not become optional because a stricter private requirement is met.

The applicant shall maintain a market-specific legal register covering, as applicable, general food law, hygiene and HACCP, food supplements, food information, allergens, nutrition and health claims, additives, vitamins and minerals, novel foods, contaminants, pesticide residues, GMO rules, food-contact materials, packaging, organic claims, environmental obligations and national notification requirements.

5.2 HIERARCHY

1. Directly applicable EU law, national implementing law and binding authority decisions take precedence.
2. Where legislation sets a stricter limit or sampling plan than this Standard, the legal requirement applies.
3. Where this Standard is stricter and does not conflict with law, the PURE requirement applies for certification.
4. Where no legal criterion exists, an adopted PURE product annex or documented risk-based technical specification applies.
5. Where uncertainty remains, certification shall be withheld until a competent legal or technical interpretation is recorded.

5.3 LEGAL REFERENCE DATE

The legal references in this Standard are identified by their base act and relevant subject. The version applicable on the date of assessment and on the date the product is placed on the market shall be used. Static numerical limits reproduced in an ECOGEA document never replace a later or more specific legal requirement.

6. SCHEME GOVERNANCE, INDEPENDENCE AND COMPETENCE

6.1 CONFORMITY-ASSESSMENT FRAMEWORK

The scheme shall be operated consistently with the applicable principles of ISO/IEC 17065:2012 and ISO/IEC 17067:2013, taking account of successor editions when published and adopted by ECOGEA. Laboratories shall normally be accredited to ISO/IEC 17025:2017 for the relevant method and matrix or shall provide equivalent evidence accepted only in exceptional, documented circumstances.

The scheme is operated as product certification with continuing surveillance. Its design follows ISO/IEC 17065 and ISO/IEC 17067 and, where suitable, the Type 5 principles described in ISO/IEC TR 17026. Laboratories shall meet ISO/IEC 17025 for the relevant method and matrix. Accreditation to an unrelated method is not sufficient.

Reference note: ISO/IEC 17065:2012 remains current in July 2026 but an ISO/IEC FDIS 17065 replacement is under development. ISO/IEC 17067 is also under revision. ECOGEA shall formally assess successor editions before adoption.

6.2 INDEPENDENCE AND IMPARTIALITY

• Evaluation and certification decisions shall be protected from commercial, financial and personal conflicts of interest.
• The person making or approving the certification decision shall not be the sole person who performed the audit or provided consultancy to the applicant.
• Consultancy that designs a product or quality system shall be separated from certification decision-making.
• Conflict-of-interest declarations shall be obtained from evaluators, laboratories, reviewers and decision-makers.
• An impartiality mechanism or committee shall review material risks and complaints.

6.3 COMPETENCE

Competence criteria shall be documented for food-law reviewers, auditors, microbiology reviewers, chemistry reviewers, sourcing reviewers and certification decision-makers. Technical review shall be performed by personnel competent in the relevant product type, analytical methods and legal criteria.

6.4 PUBLICLY AVAILABLE SCHEME INFORMATION

- current Standard and certification scope;
- application route and objective access conditions;
- fee schedule or standardized fee methodology;
- complaints and appeals procedure;
- suspension, withdrawal and misuse rules;
- label and claims-use rules;
- method for checking current certificate status;
- summary of stakeholder review and revision process.

6.5 OPEN AND NON-DISCRIMINATORY ACCESS

The scheme shall be open on fair, transparent and non-discriminatory terms to eligible applicants able to meet the requirements. Applications may be refused only on objectively justified grounds, including unlawful products, inability to verify conformity, unmanaged conflict of interest, material misrepresentation, repeated serious non-conformity, non-payment or unacceptable safety risks to persons involved in certification activities.

7. APPLICATION AND PRODUCT DOSSIER

7.1 APPLICATION INFORMATION

The applicant shall submit at minimum:

- legal name, registration details, address, VAT or other company number and responsible contact;
- brand owner, food business operator and all relevant manufacturing, filling and packing sites;
- product name, SKU, GTIN/EAN, pack size, dosage form and intended markets;
- complete quantitative formulation including compound ingredients, carriers, capsule shells, glazing agents, processing aids and overages;
- full label artwork, product page and proposed ECOGEA claims;
- manufacturing flow chart, HACCP summary and finished-product specification;
- shelf-life rationale, stability data and packaging specifications;
- supplier list and ingredient specifications, certificates of analysis and origin records;
- GMO declarations, allergen information and novel-food assessments;
- pesticide, heavy-metal, microbiological and other available analytical reports;
- environmental legal-compliance evidence for relevant sites;
- responsible-sourcing risk assessment, contracts or code commitments and higher-risk supplier evidence;
- complaints, recalls, authority findings and material non-conformities from the preceding three years.

7.2 FULL FORMULA CONFIDENTIALITY

The complete quantitative formula shall be available to the certifier under confidentiality. A public ingredient list or formula without percentages is not sufficient. Undisclosed proprietary blends are not accepted unless their complete composition is disclosed directly by the supplier to the certifier and can be assessed.

7.3 SUPPLIER DOCUMENTATION HIERARCHY

1. Primary evidence: current specification, batch certificate of analysis, traceability records, legal-status declaration and independent analytical report.
2. Supporting evidence: supplier questionnaire, quality agreement, recognized certification, audit report and historical monitoring data.
3. Low-weight evidence: general marketing statements, website claims or unsigned declarations without batch or product identification.

7.4 CHANGE NOTIFICATION

The applicant shall notify ECOGEA before implementing a material change to formulation, ingredient supplier or origin, manufacturing site, process, dosage form, packaging food-contact layer, shelf life, product name, label, claims or legal market. ECOGEA shall decide whether documentary review, additional sampling, testing or a new certification decision is required.

8. RISK CLASSIFICATION AND CERTIFICATION UNIT

8.1 RISK ASSESSMENT

Each product shall be classified using Annex F. The assessment considers intrinsic product hazard, ingredient and origin risk, process and site control, supplier and compliance history, and authenticity/fraud vulnerability. The risk score determines audit depth, sampling frequency and test scope; it does not permit relaxation of legal requirements.

8.2 RISK CLASSES

Class	Score	Minimum control model
Low	0–4	Complete dossier review; initial independent finished-product sample; annual surveillance; on-site audit may be replaced by justified off-site verification where controls are demonstrably robust.
Medium	5–9	Complete dossier review; initial and annual independent sample; on-site audit at initial certification or renewal; targeted supplier/origin verification.
High	10–15	On-site audit at initial certification and at least annually; minimum two independent samples per year unless an equivalent statistically justified plan is approved; enhanced supplier/origin and fraud controls.

8.3 PRODUCT-FAMILY GROUPING

A product family may contain no more than five SKUs unless a written statistical and technical justification is approved. Products may be grouped only where they share the same site, process, dosage form, relevant hazard profile and substantially similar ingredient base. Every SKU shall be independently tested at least once within each 24-month certification cycle, unless the certifier records a justified alternative based on identical bulk product and only pack-size variation.

9. SAMPLING, CHAIN OF CUSTODY AND LABORATORIES

9.1 INDEPENDENT SAMPLING PRINCIPLE

Certification testing shall use samples selected by, witnessed by or obtained under the control of ECOGEA or its appointed verifier. Applicant-selected samples may be used for pre-screening, corrective actions or supplementary evidence but shall not be the sole basis for initial certification or scheduled surveillance.

9.2 SAMPLING SOURCES

- manufacturing site or contract packer during or after batch release;
- warehouse or distributor stock;
- retail outlet or e-commerce purchase;
- sealed retention stock whose selection and custody were independently controlled.

9.3 MINIMUM SAMPLE QUANTITY AND UNITS

Unless a legal sampling plan or laboratory method requires more, at least three sealed consumer units from the same identifiable batch shall be collected, with total quantity sufficient for all planned tests, repeat analysis and a counter-sample. For pathogen testing, the number and mass of test portions shall follow the applicable sampling plan. Where feasible, units shall be taken from different positions in the lot or production run.

9.4 CHAIN OF CUSTODY

The sample record shall include product, batch, expiry date, pack size, quantity, place and date of sampling, sampler, condition, seal numbers, photographs where appropriate, transport conditions, laboratory receipt and deviations. Sample A is submitted for testing, Sample B is retained for dispute or confirmation and Sample C may be retained by the certificate holder under sealed custody.

9.5 LABORATORY COMPETENCE

• ISO/IEC 17025 accreditation shall cover the relevant method and, where practicable, the relevant food matrix.
• The report shall identify the sample, method, result, unit, limit of detection or quantification, measurement uncertainty where relevant, accreditation status and authorized signatory.
• A laboratory-developed or alternative method may be accepted only where validation demonstrates suitability and equivalent or better performance than the reference method.
• For alternative microbiological methods, validation shall follow ISO 16140-2:2016 including Amendment 1:2024 or an accepted equivalent framework.

9.6 RETESTING AND DISPUTES

A failed result shall not be disregarded solely because a second applicant-selected sample passes. The certifier shall investigate sampling, laboratory quality, batch history, uncertainty, legal decision rules and root cause. Confirmation shall normally use the sealed counter-sample at an independent competent laboratory. Food-safety and legal obligations, including withdrawal or recall assessment, take priority over certification dispute procedures.

10. MICROBIOLOGICAL SUITABILITY

10.1 LEGAL AND RISK BASIS

The applicant shall comply with Regulation (EC) No 852/2004, applicable hygiene and HACCP obligations, and the microbiological criteria of Regulation (EC) No 2073/2005 for product categories within its scope. Because that Regulation does not provide a complete specification for every supplement or stable food, Annex C establishes default PURE criteria for defined categories.

10.2 REFERENCE METHODS

Examination	Reference method
General microbiological examinations	ISO 7218:2024
Preparation of test samples and initial suspension	ISO 6887-1:2017 including Amendment 1:2024; relevant matrix-specific parts where applicable
Aerobic colony count at 30 °C	ISO 4833-1:2013 including Amendment 1:2022
Yeasts and moulds, aw > 0.95	ISO 21527-1:2008
Yeasts and moulds, aw ≤ 0.95	ISO 21527-2:2008
Enterobacteriaceae enumeration	ISO 21528-2:2017
β-glucuronidase-positive Escherichia coli	ISO 16649-2:2001
Salmonella spp. detection	ISO 6579-1:2017 including Amendment 1:2020
Listeria monocytogenes / Listeria spp. detection	ISO 11290-1:2017 including Amendment 1:2026
Coagulase-positive staphylococci	ISO 6888-1:2021 including Amendment 1:2023
Presumptive Bacillus cereus	ISO 7932:2004 including Amendment 1:2020
Clostridium perfringens	ISO 15213-2:2023
Alternative proprietary method validation	ISO 16140-2:2016 including Amendment 1:2024

10.3 PRODUCT CATEGORY ASSIGNMENT

Code	Category	Assignment rule
M1	Low-water-activity supplements	Tablets, capsules, gummies, granulates and non-botanical powders demonstrated to be shelf-stable, normally aw ≤ 0.85.
M2	Botanical/herbal dry products	Herbs, teas, spices, dried botanical powders and products with a substantial raw botanical burden.
M3	Oils and lipid matrices	Edible oils, softgel oils and low-water-activity lipid products.
M4	Shelf-stable liquids and syrups	Acidified, preserved or otherwise validated ambient-stable liquids; excludes products requiring refrigeration.
M5	Probiotics/live cultures	Products intentionally containing viable microorganisms; total count limits are replaced by identity and viable-count specifications.
M6	Other foods	Product-specific legal criteria and an approved technical specification are required before certification.

10.4 SAMPLING PLANS

For initial certification and high-risk products, pathogen criteria shall normally use n = 5, c = 0, with absence in each specified test portion, unless legislation specifies another plan. For annual surveillance of low- or medium-risk stable products, n = 1, c = 0 may be accepted for pathogen screening when supported by a compliant history and no legal sampling plan requires more. Indicator-organism criteria apply to a representative laboratory sample unless Annex C states otherwise.

10.5 ACCEPTANCE AND ACTIONS

A result above a legal or PURE limit is a non-conformity. Detection of Salmonella, a legally unacceptable Listeria result or another material pathogen is critical. The applicant shall initiate batch hold, root-cause investigation, corrective action and, where relevant, authority notification, withdrawal or recall assessment. Re-testing shall not replace these immediate controls.

11. CHEMICAL CONTAMINANTS

11.1 GENERAL REQUIREMENT

Each product shall have a documented contaminant risk assessment and a testing plan covering pesticides, toxic elements and additional chemical hazards relevant to ingredients, origin, processing, packaging and maximum daily intake. Applicable maximum levels and MRLs shall be taken from the current legal act and official databases at the assessment date.

11.2 PESTICIDE RESIDUES

Products containing agricultural-origin ingredients shall be covered by a pesticide testing scope that is suitable for the matrix, crop, country of origin, production system and known enforcement history. EN 15662:2018 is the default multi-residue reference for suitable matrices. LC-MS/MS and GC-MS/MS coverage shall be complemented by targeted or single-residue methods where the multi-residue method does not provide adequate recovery or sensitivity. Highly polar compounds shall be assessed using EN 18032:2025 or another validated method based on the current QuPPe approach where relevant. The laboratory shall apply the current European Commission SANTE analytical quality-control guidance.

Element	PURE requirement
Reference extraction / multi-method	EN 15662:2018, modular QuEChERS approach, followed by GC- and LC-based analysis.
Analytical quality control	Current European Commission SANTE guidance on analytical quality control and method-validation procedures for pesticide residues in food and feed.
Additional targeted methods	EN 18032:2025 or current validated EURL-SRM / EURL pesticide methods for highly polar or otherwise poorly recovered substances, including risk-relevant glyphosate/AMPA, glufosinate, chlorate/perchlorate, fosetyl/phosphonic acid and ethephon.
Acceptance	Every residue shall comply with Regulation (EC) No 396/2005 and applicable processing factors. Unexplained detections, multiple residues or evidence of unauthorised use require investigation even below the MRL.
Reporting	All detected residues at or above the reporting limit shall be listed; “not detected” shall state the reporting limit.

11.3 HEAVY METALS AND TRACE ELEMENTS

Requirement	Specification
Mandatory baseline panel	Lead, cadmium, total mercury and total arsenic for every certified product.
Risk-based additions	Inorganic arsenic, nickel, aluminium, chromium, tin or other elements where required by law, ingredient origin, daily intake or risk assessment.
Sample preparation	EN 13805:2014 pressure digestion of food samples for elemental determination or validated equivalent.
Preferred measurement	EN 15763:2009 ICP-MS determination of arsenic, cadmium, mercury and lead after pressure digestion.
Alternative measurement	EN 14084:2003 atomic absorption method where it meets required performance and legal criteria.
Acceptance	Applicable maximum levels in Regulation (EU) 2023/915 and any stricter national requirements shall be met. No universal value shall replace the legally applicable product-category limit.
Method capability	The LOQ should normally be no more than 20% of the applicable legal maximum level or PURE action level.

11.4 MYCOTOXINS AND NATURAL TOXINS

The following panel shall be applied according to Annex D and ingredient risk: aflatoxin B1, sum of aflatoxins B1/B2/G1/G2, ochratoxin A, deoxynivalenol, zearalenone, fumonisins B1/B2, T-2 and HT-2 toxins, citrinin, pyrrolizidine alkaloids, tropane alkaloids, ergot alkaloids and other legally regulated natural toxins. Sampling and analytical performance for mycotoxins shall follow Commission Implementing Regulation (EU) 2023/2782. LC-MS/MS or another validated method meeting the legal performance criteria shall be used.

11.5 OTHER RISK-RELEVANT CONTAMINANTS

- polycyclic aromatic hydrocarbons for smoked, roasted, dried or oil products;
- dioxins and PCBs for animal, marine, oil or other relevant matrices;
- ethylene oxide and 2-chloroethanol for susceptible imported ingredients, spices, seeds and extracts;
- residual extraction solvents for extracts and concentrated ingredients;
- mineral oil hydrocarbons where packaging, processing or ingredient risk justifies testing;

- PFAS where legally applicable or indicated by water, marine, packaging or environmental risk;
- veterinary medicinal residues for animal-derived ingredients;
- process contaminants such as acrylamide or 3-MCPD/glycidyl esters where relevant.

11.6 MEASUREMENT UNCERTAINTY AND DECISION RULE

The laboratory shall report measurement uncertainty where relevant. The legal decision rule shall be applied for statutory limits. For PURE private limits, the certifier shall use a documented decision rule that protects against false acceptance. Results close to a limit may trigger confirmation, investigation or increased surveillance even where formal non-compliance is not established.

12. INGREDIENT IDENTITY, ORIGIN, AUTHENTICITY AND TRACEABILITY

12.1 TRACEABILITY SYSTEM

Traceability shall comply with Article 18 of Regulation (EC) No 178/2002 and shall be designed consistently with ISO 22005:2007. Records shall connect finished-product batches to incoming ingredient lots, immediate suppliers, manufacturers and relevant primary-production or aggregation sources.

12.2 MANDATORY INGREDIENT-ORIGIN RECORD

Data field	Minimum requirement
Ingredient identity	Common name, legal name, botanical/biological name where relevant, plant part, chemical form and function.
Supplier and manufacturer	Immediate supplier and actual manufacturer/processor; traders shall not obscure the manufacturing source.
Country information	Country of manufacture/processing and country or countries of agricultural origin. “EU/non-EU” alone is insufficient when a specific origin claim is made.
Lot linkage	Supplier lot, applicant receipt lot and finished-product batch linkage.
Process	Extraction, fermentation, concentration, drying, refining, standardisation, carriers and solvents.
Certification status	Organic, fair trade, sustainability or other certificate with scope, validity and status verification where claimed.
Mass balance	Quantitative reconciliation for high-risk, certified or origin-claimed ingredients.

12.3 IDENTITY VERIFICATION

Each ingredient shall have an identity specification and appropriate verification. For high-risk materials, at least two independent or orthogonal identity elements should be used. Examples include:

- macroscopic and microscopic botanical examination;
- HPTLC, HPLC, LC-MS, GC-MS or spectroscopic fingerprinting;
- DNA-based species identification where amplifiable DNA remains and the method is suitable;
- fatty-acid, sterol or triglyceride profiles for oils;
- elemental, isotopic or authenticity profiling for specific geographical-origin claims;
- peptide/protein profiling for animal or protein materials;
- specific marker compounds and purity ratios for extracts.

There is no single universal analytical method that proves the geographical origin of every ingredient. “Verified origin” under PURE therefore means a verified documentary and traceability chain, supported by analytical authenticity testing where technically suitable and proportionate to risk.

12.4 FOOD-FRAUD VULNERABILITY ASSESSMENT

The applicant shall assess substitution, dilution, false species, false origin, undeclared synthetic actives, undeclared allergens, manipulation of certificates of analysis, false organic/fair-trade status and economically motivated adulteration. The assessment shall be reviewed at least annually and whenever price, availability, supplier or origin changes materially.

13. ADDITIVES, EXCIPIENTS AND PROCESSING AIDS

13.1 LEGAL AUTHORISATION

Every food additive shall be authorized for the applicable food category and used under the conditions of Regulation (EC) No 1333/2008. It shall comply with the purity specifications in Regulation (EU) No 231/2012. Carriers, solvents, enzymes, flavorings and processing aids shall comply with their applicable legal framework.

13.2 FULL DISCLOSURE

The applicant shall disclose to the certifier all additives, carriers, premix components, capsule materials, glazing agents, anti-caking agents, processing aids and technological residues relevant to assessment, including substances not required to appear separately in the consumer ingredient list.

13.3 PURE DECISION PRINCIPLES

1. The substance is legally authorized for the intended product and use.

2. Its identity, purity, source and technological function are documented.

3. The use is technically necessary and at the lowest effective level.

4. It is not used to disguise poor quality, mislead about color, freshness or composition, or create an unjustified “natural” impression.

5. It complies with the permitted, restricted or prohibited classification in Annex E.

6. Any nanoform or novel form has a verified legal status and explicit ECOGEA approval.

13.4 POSITIVE-LIST APPROACH

ECOGEA shall maintain a controlled PURE Additive Policy. “Permitted” does not mean that every use is automatically approved; category authorization and technical necessity remain mandatory. “Restricted” requires product-specific justification and may have a maximum PURE level. “Prohibited” prevents certification even where a use remains otherwise legal, provided the private prohibition does not conflict with law.

13.5 CONSUMER CLAIM

The permitted certification statement is “additives assessed against the ECOGEA PURE Additive Policy” or “verified free from additives prohibited by the ECOGEA PURE Standard”. The broad claim “additive-free” shall not be used where any additive, carrier or excipient is present.

14. GMO REQUIREMENTS

14.1 LEGAL FRAMEWORK

GMO assessment shall comply with Regulations (EC) No 1829/2003 and No 1830/2003 and the current EU Register of authorised GM food and feed. Event-specific methods shall use validated methods and reference materials available through the EU Reference Laboratory for GM Food and Feed where applicable.

14.2 PURE REQUIREMENTS

- Intentional use of genetically modified ingredients is prohibited.
- No unauthorized GMO may be detected at or above the validated detection capability.
- Supplier GMO declarations and traceability evidence are required for all ingredients with a plausible GMO source.
- High-risk crops and derivatives shall be tested where amplifiable DNA or protein remains and testing is technically meaningful.
- For highly refined derivatives without detectable DNA, documentary identity-preservation, mass-balance or equivalent controls shall be used.

14.3 ANALYTICAL METHODS

Stage	Reference
DNA extraction	ISO 21571:2005 including Amendment 1:2013
General GMO analysis requirements	ISO 24276:2006 including Amendment 1:2013
Qualitative nucleic-acid methods	ISO 21569:2005 including Amendment 1:2013
Quantitative nucleic-acid methods	ISO 21570:2005 including Amendment 1:2013
Event-specific methods	Current validated EURL GMFF method for the relevant event and matrix

14.4 PURE ACTION LIMITS

Result	Certification treatment
Unauthorised GMO detected	Critical non-conformity; certification refused or suspended; legal escalation assessed.
Intentional authorised GM ingredient	Not eligible for PURE certification.
Authorised GM material > 0.9% per ingredient	Critical non-conformity and legal labelling/traceability assessment.
Authorised GM material > 0.1% and ≤ 0.9%	Major non-conformity unless documented as adventitious and technically unavoidable; corrective action and follow-up testing required. A “GMO-free” claim is not permitted.
≤ 0.1% or not detected	May be accepted if no intentional use, traceability is adequate and the method capability is stated.

The 0.1% value is a PURE action threshold, not a replacement for the EU legal labelling threshold. The target method LOQ should be 0.1% or lower and the target LOD should be 0.05% or lower where technically feasible.

15. ENVIRONMENTAL LEGAL COMPLIANCE

15.1 SCOPE OF VERIFICATION

Environmental compliance shall be assessed for the certified product's relevant manufacturing and packing sites and for high-risk upstream operations where the certified claim would otherwise be misleading. The assessment verifies legal controls; it does not certify full lifecycle environmental performance.

15.2 ENVIRONMENTAL LEGAL REGISTER

- site permits, registrations and environmental authority conditions;
- waste classification, storage, transfer and authorised disposal or recovery;
- wastewater discharge permits, monitoring and treatment;
- air emissions, boilers, solvents, odour and dust controls where applicable;
- hazardous substances, spill prevention and incident records;
- water abstraction and use where regulated;
- packaging, extended producer responsibility and applicable recyclability/labelling obligations;
- deforestation due diligence for commodities and products within Regulation (EU) 2023/1115 when applicable;
- unresolved notices, penalties, prosecutions or corrective actions from the preceding three years.

15.3 PACKAGING DEVELOPMENTS

Packaging shall comply with the applicable food-contact framework, including Regulation (EC) No 1935/2004, Regulation (EC) No 2023/2006 and, for plastic materials, Regulation (EU) No 10/2011. Regulation (EU) 2024/3190 and its amendments apply to bisphenol A and other specified bisphenols in food-contact materials. Regulation (EU) 2025/40 on packaging and packaging waste applies from 12 August 2026, subject to its transitional provisions. The applicant shall maintain declarations of compliance, supporting migration data and evidence for environmental packaging claims.

15.4 DEFORESTATION DUE DILIGENCE

Where a product contains cattle, cocoa, coffee, oil palm, rubber, soya, wood or covered derived products, the applicant shall assess Regulation (EU) 2023/1115 and its current application dates. The present dates are 30 December 2026 for most operators and traders and 30 June 2027 for qualifying micro and small operators, unless the legislation is amended. PURE verification does not replace the operator's due-diligence statement or other statutory obligations.

15.5 ENVIRONMENTAL CLAIMS LIMITATION

Certification under this section does not permit generic claims such as "environmentally friendly", "green", "climate positive", "zero impact" or "sustainable product". Any additional environmental claim requires specific substantiation, lifecycle boundaries, measurement method and separate written approval in accordance with consumer-protection law and Directive (EU) 2024/825.

16. RESPONSIBLE AND FAIR SOURCING

16.1 NORMATIVE BASIS

The mandatory code in Annex G is informed by Directive (EU) 2019/633 on unfair trading practices, the ILO fundamental principles and rights at work, ISO 20400:2017, ISO 26000:2010 and ISO/TS 26030:2019. These guidance standards do not by themselves constitute a certifiable fair-trade scheme; PURE therefore defines auditable product-supply-chain requirements.

16.2 MINIMUM REQUIREMENTS

- written terms covering product, quality, price or pricing method, quantity, delivery and payment;
- payment within the applicable legal or agreed period and no prohibited unilateral or retrospective changes;
- no forced labor, trafficking or worst forms of child labor;
- respect for lawful freedom of association and collective bargaining;
- non-discrimination and no harassment or abuse;
- safe and healthy working conditions and access to potable water and sanitation where relevant;
- grievance, investigation and remediation mechanism;
- risk-based traceability to producer, cooperative, farm group or primary processor;
- enhanced review for high-risk commodity-country combinations;
- corrective action that prioritizes remediation and responsible disengagement rather than abrupt abandonment where that would worsen harm.

16.3 BASIC AND ENHANCED CLAIM LEVELS

Level	Meaning	Permitted consumer communication
Mandatory PURE sourcing	Compliance with Annex G minimum controls and risk-based verification.	"Responsible sourcing requirements independently verified under ECOGEA PURE."
Enhanced fair-trade module	Documented producer-benefit criteria, fair pricing or premium, democratic producer participation where relevant, traceable benefit and independent verification or accepted equivalent scheme.	A specific "fair trade verified" claim only in wording approved by ECOGEA.

The ECOGEA PURE label alone shall not be presented as equivalent to Fairtrade, Fair for Life or another named certification. Recognition of an equivalent scheme requires a documented benchmark and current certificate-status check.

17. DECLARED COMPOSITION, ACTIVE CONTENT AND PRODUCT INTEGRITY

17.1 INGREDIENT AND FINISHED-PRODUCT IDENTITY

The finished product shall correspond to the approved quantitative formula and specification. Batch records shall identify raw materials, quantities, yields, deviations, in-process controls and release decision. Undeclared substitution, dilution or over-labelling is a critical integrity failure.

17.2 INDEPENDENT ACTIVE-CONTENT PLAN

At initial certification, all quantitatively declared vitamins, minerals, botanical markers, characteristic fatty acids, viable microorganisms and other material active substances shall be covered by independent testing or a justified combination of independent testing and validated batch data. During each 24-month cycle, every declared active or representative marker shall be independently tested at least once. At least one identity or active-content parameter shall be included in each annual surveillance sample.

17.3 DEFAULT ACCEPTANCE FRAMEWORK

Parameter	Default rule
Legally regulated nutrient or substance	Applicable EU/national tolerance, authorized form, maximum level and labelling rule take precedence.
Botanical standardization marker	At release: within approved finished-product specification, normally 90–110% of declared target unless justified. At end of shelf life: normally not below 80% of declared value and not above any safety maximum.
Other quantitative active	At release: normally 90–110% of declared value; end-of-shelf-life specification shall be scientifically justified.
Probiotic count	At or above the declared viable count through the stated shelf life, with strain identity verified by an appropriate method.
Mineral identity	Correct chemical form and elemental quantity verified by appropriate ICP or other validated method.
Botanical identity	Species/plant part and fingerprint or marker profile conform to specification.

The default ranges are private criteria and shall not be used where they conflict with a legally recognized tolerance, pharmacopoeial/compendial method, measurement uncertainty or a scientifically justified stability specification approved by ECOGEA.

17.4 OVERAGES

Technological overages may be used only where necessary to maintain the declared content throughout shelf life. The overage shall be documented, safety-assessed and shall not cause a legal maximum or upper intake level to be exceeded at release.

18. ALLERGENS, LABELLING, CLAIMS, NOVEL FOODS AND PACKAGING

18.1 FOOD INFORMATION

Mandatory food information shall comply with Regulation (EU) No 1169/2011 and applicable national language rules. The review covers the legal name, ingredient list, allergens, quantitative ingredient declarations where required, net quantity, date marking, storage and use conditions, responsible food business operator, origin information, instructions for use and nutrition declaration where applicable. For distance selling, mandatory information that must be available before purchase shall be presented on the product page or another directly accessible location before the order is completed.

18.2 FOOD-SUPPLEMENT REQUIREMENTS

A food supplement shall comply with Directive 2002/46/EC, Regulation (EU) No 1169/2011 and applicable national provisions. The certification review shall verify, where applicable:

- the sales name “food supplement” or the legally required national equivalent;
- the names of the categories of nutrients or substances that characterize the product, or an indication of their nature;
- the recommended daily portion and the amount of relevant nutrients or substances per daily portion;
- a warning not to exceed the stated recommended daily dose;
- a statement that food supplements should not be used as a substitute for a varied and balanced diet and a healthy lifestyle;
- a statement that the product should be stored out of reach of young children;
- reference intake percentages where legally applicable;
- mandatory particulars, warnings, conditions of use and quantitative declarations required by EU and national law;
- national notification or registration requirements in every intended market; and
- absence of medicinal, disease-prevention, treatment or cure claims.

18.3 ALLERGENS AND CROSS-CONTACT

The applicant shall maintain an allergen risk assessment covering ingredients, compound ingredients, rework, shared equipment, cleaning validation and supplier changes. Precautionary allergen labelling shall be based on a documented risk assessment and shall not replace good manufacturing controls.

18.4 NUTRITION AND HEALTH CLAIMS

Nutrition and health claims shall comply with Regulation (EC) No 1924/2006, the EU Register and conditions of use. Medicinal, disease-treatment, unauthorized health, absolute safety and guaranteed-effect claims are prohibited. ECOGEA certification shall not be presented as scientific proof of a health benefit.

18.5 NOVEL FOODS AND OTHER SUBSTANCES

Every non-conventional ingredient, extract, microorganism, production process or new source shall undergo a documented novel-food assessment under Regulation (EU) 2015/2283 and the current Union list in Implementing Regulation (EU) 2017/2470. The Commission Novel Food Status Catalogue is informative and non-binding; evidence of significant consumption before 15 May 1997 or an authorization may be required. Regulation (EC) No 1925/2006 and national restrictions for other substances shall also be assessed.

18.6 FOOD-CONTACT PACKAGING

Food-contact materials shall comply with Regulation (EC) No 1935/2004, applicable good manufacturing practice and specific measures such as Regulation (EU) No 10/2011 for plastics. Declarations of compliance, migration testing, intended conditions of use and barrier assumptions shall be available where required. Packaging shall protect the product throughout shelf life and shall not introduce an unacceptable contaminant risk.

19. STABILITY AND SHELF LIFE

19.1 SHELF-LIFE SUBSTANTIATION

The declared shelf life shall be supported by real-time data, scientifically justified accelerated data, historical equivalent-product data or a documented combination. The plan shall address product-specific microbiology, active content, oxidation, moisture, physical integrity, organoleptic change and packaging interaction.

19.2 MINIMUM STABILITY POINTS

For a new product without adequate historical data, the initial plan should include release, an intermediate point and end-of-shelf-life testing. High-risk or unstable products may require more points. Where certification is granted before complete real-time data are available, a post-certification commitment and conservative shelf life shall be recorded.

19.3 RETENTION SAMPLES AND ADVERSE TRENDS

Retention samples shall be stored under labelled conditions for at least the shelf life plus a reasonable investigation period. A material adverse trend, complaint or out-of-specification result shall be reported to ECOGEA and may trigger testing, label correction, shelf-life reduction or suspension.

20. CERTIFICATION PROCESS AND DECISION

20.1 PROCESS OVERVIEW

1. Application and scope confirmation.
2. Pre-screening of legal eligibility and product category.
3. Certification agreement and conflict-of-interest check.
4. Complete product dossier and supplier evidence review.
5. Risk classification and product-family decision.
6. Sampling plan and independent sample collection.
7. Laboratory testing and technical review.
8. Site, remote or hybrid audit according to risk.
9. Non-conformity correction and verification.
10. Independent certification decision.
11. Certificate issue, public-status record and controlled claim/logo approval.

20.2 AUDIT METHOD

Audits may be on-site, remote or hybrid. On-site assessment is mandatory where required by risk class, where records cannot establish effective controls, where there is a serious complaint or non-conformity, or where ECOGEA needs to verify manufacturing, storage, mass balance, environmental or labor conditions directly.

20.3 CERTIFICATION DECISION

Certification shall be granted only after all critical and major non-conformities are closed to the satisfaction of the independent decision function. Minor non-conformities may remain open only where they do not affect product conformity and a time-bound corrective action is accepted. The decision record shall identify products, sites, versions, test reports, limitations and approved claims.

20.4 CERTIFICATE CONTENT

- certificate number and current status;
- certificate holder and relevant brand owner;
- exact product names, SKU/GTIN where available, dosage form and pack scope;
- manufacturing site or site reference where appropriate;
- Standard version and applicable annexes;
- issue date, surveillance due date and expiry date;
- certification scope and any limitations;
- verification route or public register reference;
- authorized certification decision and signature.

21. CERTIFICATE VALIDITY, SURVEILLANCE AND RENEWAL

21.1 CERTIFICATE VALIDITY

MANDATORY VALIDITY RULE

An ECOGEA PURE certificate is valid for 24 months from the issue date, unless it is suspended, withdrawn, reduced in scope or replaced. Continued validity is conditional on successful surveillance and compliance with change-notification duties.

An ECOGEA PURE certificate is valid for 24 months from the issue date stated on the certificate, unless it expires earlier because of a reduced scope, suspension, withdrawal or legal prohibition. Continued validity depends on satisfactory surveillance during each 12-month period and on timely notification of changes. A certificate is not evidence that every production batch has been tested for every possible hazard.

21.2 ANNUAL SURVEILLANCE

At least one surveillance review shall be completed during each 12-month period. The first surveillance shall normally be completed by month 12, with a maximum administrative tolerance of 30 days where justified and approved before the due date. Failure to complete required surveillance results in suspension unless the delay is caused by ECOGEA and product conformity remains demonstrable.

Surveillance shall include at minimum:

- updated legal and product dossier review;
- confirmation of formulation, supplier, origin, site, packaging, shelf-life and label changes;
- independent sampling and risk-based laboratory testing;
- review of complaints, adverse events, recalls, authority actions and non-conformities;
- supplier and responsible-sourcing update;
- environmental legal-compliance update;
- certificate and online claims-status check.

21.3 UNANNOUNCED AND TRIGGERED SURVEILLANCE

ECOGEA may obtain products from the market, require additional testing or conduct an unannounced audit when there is a complaint, RASFF or authority alert, supplier change, unexpected contaminant, fraud signal, product reformulation, significant incident or other reason to question continued conformity.

21.4 RENEWAL

The certificate holder should submit a complete renewal application at least 90 days before expiry. Renewal includes an updated legal and product dossier review, a new independent sample, the required laboratory panel, an updated supplier and origin assessment, review of surveillance history and an audit according to risk. Renewal is effective only after a new positive certification decision; certificates do not renew automatically.

21.5 ADDITION OF PRODUCTS

New products may be added to an existing certificate following product-specific evaluation and decision. The added product normally adopts the existing certificate expiry date. Where fewer than 90 days remain, ECOGEA may require full renewal rather than a short-term addition.

22. NON-CONFORMITY, SUSPENSION, WITHDRAWAL AND RECALL

22.1 CLASSIFICATION

Class	Examples	Minimum consequence
Critical	Pathogen or immediate safety risk; contaminant above legal maximum; unauthorised GMO; illegal ingredient; falsified records; deliberate concealment; fraudulent origin; intentional serious labour abuse; operation without essential permit.	Refusal, immediate suspension or withdrawal; recall/authority escalation assessed without delay.
Major	Traceability failure; missed mandatory testing; significant label/claim violation; unresolved supplier approval; restricted additive without justification; failed surveillance; material environmental or sourcing control failure.	Certification withheld or corrective action within a short-defined period; suspension if not closed or if product integrity is uncertain.
Minor	Isolated documentation or record-control deficiency not affecting legal status, safety, identity or claim accuracy.	Time-bound corrective action, verified at agreed follow-up.

22.2 IMMEDIATE NOTIFICATION BY CERTIFICATE HOLDER

The certificate holder shall notify ECOGEA without undue delay, and normally within one working day, of a recall, authority action, serious adverse event, confirmed pathogen, legal contaminant exceedance, unauthorized GMO, fraud allegation, material labor-rights incident or environmental enforcement action affecting certified scope.

22.3 SUSPENSION

During suspension, no new product may be manufactured, labelled, advertised or placed on the market as ECOGEA PURE certified. Online and retailer claims shall be removed or disabled without undue delay. ECOGEA shall record the status and conditions for reinstatement.

22.4 WITHDRAWAL

Withdrawal terminates certification. The certificate holder shall stop all certification claims, return or destroy controlled label files as required, notify relevant commercial partners and implement any product disposition or recall measures. Reapplication may require a defined waiting period and enhanced assessment.

22.5 COMPLAINTS AND APPEALS

Applicants and certificate holders may use the published complaints and appeals procedure. An appeal does not automatically stay a food-safety action, market withdrawal, public-status change or suspension necessary to protect consumers or scheme integrity.

23. CLAIMS AND LABELLING RULES

23.1 PRODUCT-SPECIFIC AUTHORISATION AND CERTIFICATION BOUNDARY

The ECOGEA PURE label and claim may be used only for products explicitly listed on a valid certificate and only in approved artwork. Provision of artwork or completion of an audit does not constitute certification. Pre-certification commercial use is prohibited.

23.2 MEANING OF THE WORD PURE

PREFERRED CONSUMER-FACING WORDING

ECOGEA PURE certified – independently verified product integrity, traceability and risk-based testing under the ECOGEA PURE Standard.

PURE is the name of the ECOGEA certification scheme. It does not mean that a product is absolutely pure, completely free from all contaminants, risk-free, free from every pesticide, made without all additives or tested for every possible substance. Packaging and advertising shall not use the word in a way that creates such an impression.

23.3 CORRECT CERTIFICATION NAME

The correct designation is “ECOGEA PURE certified”. It may be followed by the approved explanatory wording: “independently verified product integrity, traceability and risk-based testing under the ECOGEA PURE Standard”. The name shall not be shortened to “PURE approved”, “government verified”, “officially safe” or another expression suggesting public-authority approval.

23.4 MANDATORY CERTIFICATE REFERENCE

Where the certification mark is used on packaging, the certificate number, unique verification reference or QR code leading to the public certificate-status record shall appear on the packaging or in a directly accessible digital location approved by ECOGEA. The reference shall identify the exact certified product.

23.5 OPTIONAL VERIFIED-FEATURE STATEMENTS

The following statements may be used only where the exact feature is within the approved scope and the wording has been approved for the product:

- Microbiological suitability verified to applicable ECOGEA PURE criteria.
- Independent pesticide and heavy-metal testing reviewed under ECOGEA PURE.
- Ingredient origin and traceability independently verified.
- Additives assessed against the ECOGEA PURE Additive Policy.
- Verified free from additives prohibited by the ECOGEA PURE Standard.
- No intentional use of genetically modified ingredients.
- Environmental legal compliance verified for the declared manufacturing and packing sites.
- Responsible sourcing requirements independently verified under ECOGEA PURE.
- Enhanced fair-trade requirements verified, only where the enhanced module has been passed.

23.6 “NOT DETECTED” AND FREE-FROM STATEMENTS

A “not detected” statement shall identify, or make directly accessible, the tested analyte or panel, the product or batch, the method or method family, the reporting limit and the test date. “Pesticide-free”, “zero pesticides”, “contaminant-free”, “toxin-free”, “chemical-free”, “100% safe” and equivalent absolute claims are prohibited. Free-from statements shall be truthful, useful, substantiated and shall not present compliance with the law as a unique benefit or denigrate lawful ingredients.

23.7 USE OF TEST RESULTS

A result for one batch shall not be presented as proof that every batch is identical unless the certification programme expressly includes batch-by-batch testing. Laboratory reports shall not be excerpted in a misleading manner. Measurement uncertainty, method scope and reporting limits shall be respected in all communications.

23.8 ONLINE PRODUCT PAGES AND RETAILER LISTINGS

Online use shall be linked to the exact certified SKU. A retailer may not use the PURE mark as a category badge or filter where the category includes uncertified products. Product pages should display the correct certification name, certificate-status reference and approved feature statements. Claims made by distributors, affiliates and retailers remain subject to the certificate holder’s control obligations.

23.9 ORGANIC, NATURAL, ENVIRONMENTAL AND FAIR-TRADE CLAIMS

PURE certification does not establish organic status, natural composition, climate neutrality, lifecycle environmental superiority or fair-trade status. Such claims require their own legal basis and substantiation. A specific fair-trade statement may be used only after successful assessment under the enhanced fair-trade module or an accepted equivalent scheme.

23.10 APPROVAL OF ARTWORK AND CHANGES

Final packaging artwork and the material online claim set shall be approved before commercial use. Changes to product name, pack format, certificate reference, claims, logo placement or explanatory text shall be submitted before implementation. Minor translations may be accepted where meaning is unchanged and legal language requirements are met.

APPROVED CORE WORDING
ECOGEA PURE certified – independently verified product integrity, traceability and risk-based testing under the ECOGEA PURE Standard.

23.11 ADDITIONAL APPROVED FACTUAL STATEMENTS

- microbiological suitability verified to the applicable PURE product criteria;
- pesticide and heavy-metal testing independently reviewed;
- ingredient origin and traceability independently verified;
- additives assessed against the ECOGEA PURE Additive Policy;
- no intentional use of genetically modified ingredients; testing applied where technically relevant;
- responsible-sourcing requirements independently verified.

Each statement requires the exact requirement to have been assessed and shall be read with the certification scope and limitations. “Not detected” claims shall state or make accessible the test scope and reporting limit.

23.12 PROHIBITED WORDING AND IMPLICATIONS

- government approved, EU approved or institutionally guaranteed;
- 100% safe, zero risk, completely contaminant-free or free from every pesticide;
- organic, natural, sustainable, climate-neutral or environmentally friendly solely because the product is PURE certified;
- fair trade without the enhanced fair-trade module or accepted equivalent certification;
- GMO-free as an absolute claim without the approved qualified wording and evidence;
- certification of the whole company, factory or brand where only identified products are certified;
- health, therapeutic or disease claims derived from certification status.

23.13 PUBLIC CERTIFICATE-STATUS REGISTRY

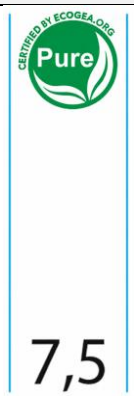
ECOGEA shall maintain a method for confirming certificate number, holder, listed products, issue and expiry dates, current status and relevant limitations. Suspended or withdrawn status shall be reflected without undue delay. A QR code may link to this record but shall not replace mandatory product information.

24. ECOGEA PURE LOGO RULES

24.1 Official logo

Only official ECOGEA Pure logo artwork supplied or approved by ECOGEA may be used.

Quick view of logo and sizes (see next chapters for details):

Preferred sizes		Smaller sizes – not recommended	
			
Width 15 mm and more (Normal size)	Width 10 - 14 mm (Small size)	Width 7,5 - 9 mm (Extra small size)	Width 5 - 7 mm (Extra extra small size)

Follow these basic guidelines:

• Regardless of the shape of the logo on the packaging, the basic requirement is that the logo is readable and well visible.

• In accordance with the size of the packaging, its color and the quality of the print, use the optimal logo, considering the basic rules of graphic design, aesthetics, and color compliance rules.

• Do not scale logos below the minimum size. In the case of extremely small packaging, please contact ECOGEA Institute and you will be provided with logo suitable for your packaging.

• If there are several quality logos on the packaging, the Ecogea standard logo must be at least equivalent in size.

• If possible, use the primary logo in green.

• Do not modify the logos formally, do not decorate, distort or alter them, and do not interfere with their field of inviolability.

• Use only claims as described in the current ECOGEA Standard.

24.2 Permitted logo versions

Permitted versions are the official primary, black and white/negative versions supplied by ECOGEA. Any non-standard single-colour version requires prior written approval.

CMYK	Black	CMYK	Black	CMYK Black	Size
					10 < 15 mm
PRIMARY BASIC		*SECONDARY TRANSPARENT*		*NEGATIVE*	15 mm ≤

24.3 Minimum size

The logo must be clearly legible. ECOGEA may define minimum sizes in the official artwork package or Style Guide. Use below the approved minimum size is not permitted without written approval.

24.4 Safe area and space of inviolability

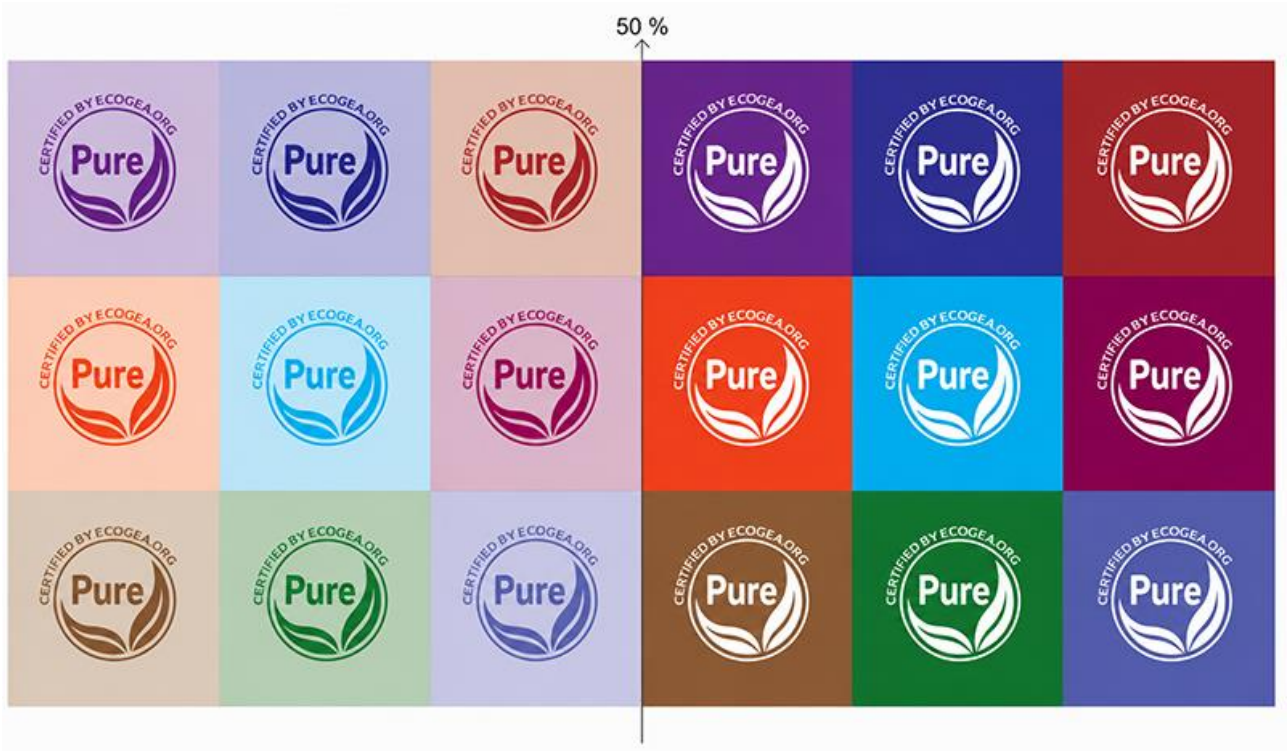
The prescribed clear space around the logo must be respected. Text, graphics, borders or other certification marks must not interfere with the logo safe area. Space of inviolability is safe area where other graphic elements from the packing are not allowed to interfere. Background color is exception in this case.

Space of inviolability (safe area)	Space of inviolability (safe area)
	
Logos from 10 to 14,99 mm are in category **10 mm** 10 mm < 15 mm	Logos from 15 mm and upare in category **15 mm** 15 mm ≤

Smallest recommended size is 10 mm. There are also options for smaller logos on extra small packages. Please contact Ecogea Institute for different solutions.

24.5 Appearance on colour and backgrounds

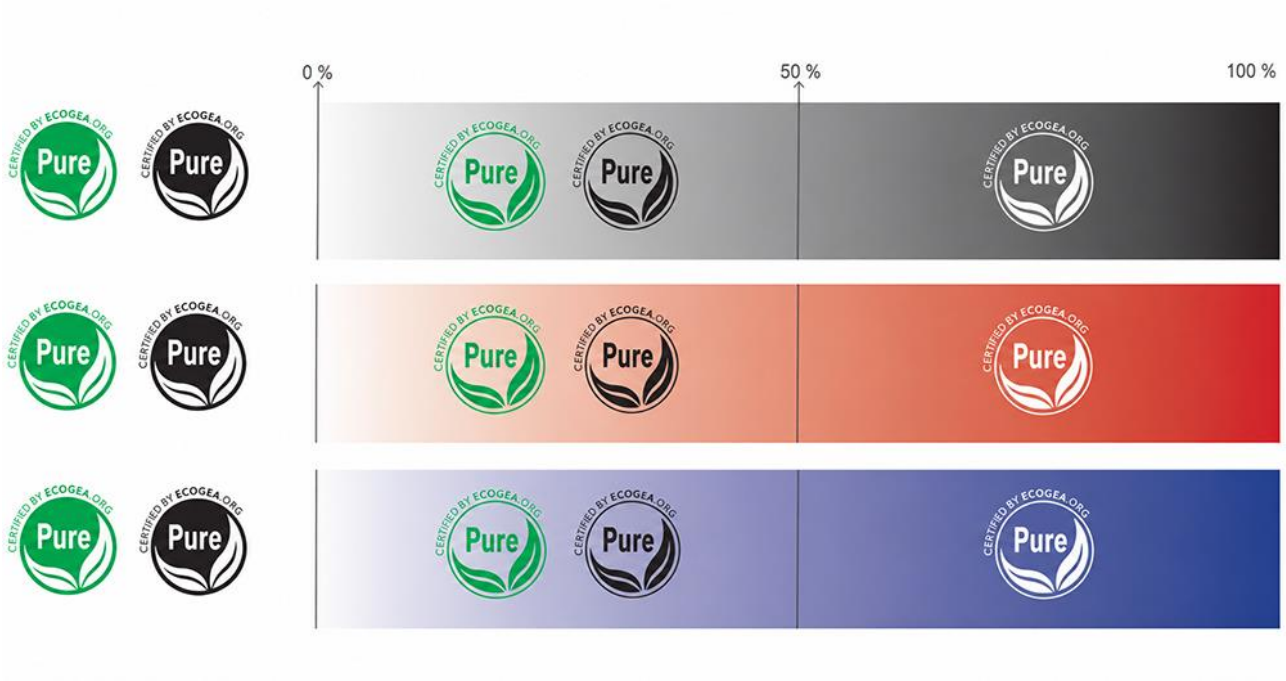
The logo must have sufficient contrast and visibility. The white/negative version should be used on dark or saturated backgrounds where appropriate. Recoloring is not permitted unless ECOGEA has approved the specific artwork. If basic green color is not suitable/compatible with your graphic it is possible to change it into any other color with color saturation more than 50 %. White logo (negative) is recommended for all backgrounds with color saturation more than 50%.



Positive **Negative**

Primary basic Secondary transparent

Background color saturation benchmark: White logo in negative is recommended for all labels/packings with background color saturation more than 50 %.



24.6 Prohibited modifications

Stretching, cropping, rotating, distortion, multicolouring, gradients, shadows, effects, added slogans, changed typography or other modifications are prohibited.

Distortion

Transformation

Multicoloring

24.7 Use on packaging

The label may be used on primary and/or secondary packaging of the certified product according to ECOGEA approval. Product-specific scope must remain clear.

Where the label can be used
- Product packaging.
- Product page.
- Retailer online shop.
- Catalogue.
- POS materials.
- Only in relation to the certified product.

24.8 Use online

Online use must be linked to the exact certified product and must not be used as a generic brand badge or category filter for uncertified products.

24.9 Use in catalogues, advertising and POS materials

Use in catalogues, advertising and point-of-sale materials must identify the certified product and must not imply range-wide certification unless all products covered by the claim are certified and the wording is approved.

25. RECORDS, CONFIDENTIALITY AND DATA INTEGRITY

25.1 RECORD RETENTION

Certification records, decisions, laboratory reports, audit evidence, complaints and corrective actions shall be retained for at least the certificate period plus five years, or longer where law, contract or product shelf life requires. Certificate holders shall retain batch and traceability records for the legally required period and at least through shelf life plus one year.

25.2 DATA INTEGRITY

• records shall be attributable, legible, contemporaneous, original or verified copies, accurate, complete, consistent, enduring and available;
• alterations shall be traceable and shall not obscure the original entry;
• electronic records shall have access control, backup and audit-trail arrangements proportionate to risk;
• laboratory and supplier reports shall be verified for identity, batch, date, scope and authenticity;
• falsification or deliberate omission is a critical non-conformity.

25.3 CONFIDENTIALITY AND DISCLOSURE

ECOGEA and its appointed parties shall protect confidential formula, supplier and commercial information, subject to legal obligations and the need to disclose certification status, safety risks, enforcement actions or scheme information. The certification agreement shall define permitted disclosure and data protection responsibilities.

ANNEX A – EU LEGAL REFERENCE FRAMEWORK

This annex is normative as to subject matter but dynamic as to consolidated versions. The current act, amendments, annexes and national rules shall be checked at the assessment date.

Legal instrument	Primary relevance to PURE
Regulation (EC) No 178/2002	General principles of food law, safety responsibility, withdrawal/recall and traceability.
Regulation (EC) No 852/2004	Food hygiene and HACCP-based procedures.
Regulation (EC) No 2073/2005	Microbiological criteria for applicable food categories.
Regulation (EU) 2017/625	Official controls and other official activities.
Directive 2002/46/EC	Food supplements; EU baseline and national implementing requirements.
Regulation (EU) No 1169/2011	Food information, allergens, distance selling and consumer information.
Regulation (EC) No 1924/2006	Nutrition and health claims.
Regulation (EC) No 1925/2006	Addition of vitamins, minerals and certain other substances to foods.
Regulation (EU) 2015/2283	Novel foods.
Implementing Regulation (EU) 2017/2470	Union list of authorised novel foods and conditions of use.
Regulation (EC) No 1333/2008	Food additives and conditions of use.
Regulation (EU) No 231/2012	Specifications for food additives.
Regulation (EC) No 396/2005	Maximum residue levels for pesticides.
Regulation (EU) 2023/915	Maximum levels for certain contaminants in food.
Regulation (EC) No 333/2007	Sampling and analysis for specified trace elements and process contaminants.
Implementing Regulation (EU) 2023/2782	Sampling and analysis for mycotoxins.
Regulations (EC) No 1829/2003 and No 1830/2003	GM food/feed authorisation, traceability and labelling.
Regulation (EC) No 1935/2004	Food-contact materials and articles.
Regulation (EU) No 10/2011	Plastic food-contact materials.
Regulation (EU) 2025/40	Packaging and packaging waste; generally applicable from 12 August 2026.
Directive (EU) 2019/633	Unfair trading practices in the agricultural and food supply chain.

Legal instrument	Primary relevance to PURE
Regulation (EU) 2023/1115	Deforestation-free supply chains for relevant commodities and products, as amended, including current application dates and due-diligence obligations.
Directive (EU) 2024/825	Consumer protection against misleading environmental/social claims and private sustainability labels; national measures apply from 27 September 2026.
Applicable national law	Food-supplement notification, botanicals, national composition/maximum levels, language, claims and enforcement.
Regulation (EU) 2024/3190	Bisphenol A and other specified bisphenols in food-contact materials; current amendments and transition rules apply.
Regulation (EU) 2024/3015	Prohibition of products made with forced labour; due-diligence and enforcement relevance, generally applicable from 14 December 2027.
Regulation (EC) No 1332/2008	Food enzymes and conditions for their lawful use.
Regulation (EC) No 1334/2008	Flavourings and food ingredients with flavouring properties.
Directive 2009/32/EC	Extraction solvents used in the production of foodstuffs and food ingredients.
Regulation (EU) 2018/775	Origin or place-of-provenance indication for the primary ingredient where Article 26(3) of Regulation 1169/2011 applies.
Regulation (EU) 2018/848	Organic production and labelling where an organic ingredient or product claim is made.
Regulation (EC) No 2023/2006	Good manufacturing practice for materials and articles intended to come into contact with food.
Regulation (EU) 2022/1616	Recycled plastic materials and articles intended to come into contact with food, where applicable.
Directive 2005/29/EC, as amended	Unfair commercial practices and misleading claims, including amendments introduced by Directive (EU) 2024/825.

ANNEX B – NORMATIVE AND REFERENCE METHODS

Area	Reference	Use in PURE
Conformity assessment	ISO/IEC 17065:2012	Requirements for bodies certifying products, processes and services.
Scheme design	ISO/IEC 17067:2013	Fundamentals and guidelines for product certification schemes.
Laboratories	ISO/IEC 17025:2017	Competence, impartiality and consistent laboratory operation.
Traceability	ISO 22005:2007	Feed and food chain traceability system design and implementation.
Micro general	ISO 7218:2024	General requirements and guidance for microbiological examinations.
Sample preparation	ISO 6887-1:2017 + Amd 1:2024	Preparation of test samples and initial suspension.
Aerobic count	ISO 4833-1:2013 + Amd 1:2022	Colony count at 30 °C by pour plate.
Yeasts/moulds	ISO 21527-1:2008 / ISO 21527-2:2008	Selection according to water activity.
Enterobacteriaceae	ISO 21528-2:2017	Colony-count enumeration.
E. coli	ISO 16649-2:2001	β-glucuronidase-positive E. coli enumeration.
Salmonella	ISO 6579-1:2017 + Amd 1:2020	Detection method.
Listeria	ISO 11290-1:2017 + Amd 1:2026	Detection of L. monocytogenes and Listeria spp.
Staphylococci	ISO 6888-1:2021 + Amd 1:2023	Coagulase-positive staphylococci enumeration.
B. cereus	ISO 7932:2004 + Amd 1:2020	Presumptive B. cereus enumeration.
C. perfringens	ISO 15213-2:2023	Enumeration of C. perfringens.
Alternative microbiology	ISO 16140-2:2016 + Amd 1:2024	Validation against a reference method.
Pesticides	EN 15662:2018	QuEChERS modular method with GC/LC-based analysis.
Element digestion	EN 13805:2014	Pressure digestion for elemental analysis.
Trace elements	EN 15763:2009	ICP-MS determination of As, Cd, Hg and Pb after digestion.
AAS alternative	EN 14084:2003	AAS determination of specified elements after microwave digestion.

Area	Reference	Use in PURE
GMO general	ISO 24276:2006 + Amd 1:2013	General requirements and definitions.
GMO qualitative	ISO 21569:2005 + Amd 1:2013	Qualitative nucleic-acid-based methods.
GMO quantitative	ISO 21570:2005 + Amd 1:2013	Quantitative nucleic-acid-based methods.
GMO extraction	ISO 21571:2005 + Amd 1:2013	Nucleic-acid extraction.
Sustainable procurement	ISO 20400:2017	Guidance used in responsible-sourcing assessment.
Social responsibility	ISO 26000:2010; ISO/TS 26030:2019	Guidance for social responsibility and application in the food chain.
Highly polar pesticides	EN 18032:2025	Risk-based determination of highly polar pesticide residues using the QuPPe approach.
Pesticide analytical quality control	European Commission SANTE/11312/2021, current 2026 edition	Method validation, identification, calibration, recovery and quality-control requirements.
Product certification declarations	ISO/IEC TR 17026:2015	Reference for product certification scheme type and continuing surveillance principles where applicable.

A successor edition, amendment, CEN adoption or legally prescribed method shall be evaluated before use. ISO standards are copyrighted; this Standard references but does not reproduce their protected technical content.

ANNEX C – PURE MICROBIOLOGICAL CRITERIA

NORMATIVE TECHNICAL STATUS

The following criteria are private ECOGEA PURE certification limits. They apply in addition to the law and do not replace a statutory microbiological criterion. Where legislation prescribes a different sampling plan or stricter result, the legal requirement takes precedence. ECOGEA may adopt a product-specific criterion where the listed category is not technically suitable.

Category	Parameter	PURE criterion	Method
M1 Low-aw supplements	Aerobic colony count	≤ 1.0×10^4 CFU/g	ISO 4833-1
M1	Yeasts and moulds	≤ 1.0×10^3 CFU/g	ISO 21527-1 or -2
M1	Enterobacteriaceae	≤ 1.0×10^2 CFU/g	ISO 21528-2
M1	E. coli	Not detected in 1 g, or < 10 CFU/g where an enumeration method is used	Validated detection/MPN method or ISO 16649-2 with an appropriate reporting limit
M1	Salmonella spp.	Absent in 25 g; c = 0	ISO 6579-1
M1	Coagulase-positive staphylococci	≤ 1.0×10^2 CFU/g	ISO 6888-1
M1	Presumptive B. cereus	≤ 1.0×10^3 CFU/g where relevant	ISO 7932
M2 Botanical dry	Aerobic colony count	≤ 1.0×10^5 CFU/g	ISO 4833-1
M2	Yeasts and moulds	≤ 1.0×10^4 CFU/g	ISO 21527-1 or -2
M2	Enterobacteriaceae	≤ 1.0×10^3 CFU/g	ISO 21528-2
M2	E. coli	≤ 1.0×10^2 CFU/g	ISO 16649-2
M2	Salmonella spp.	Absent in 25 g; c = 0	ISO 6579-1
M2	Coagulase-positive staphylococci	≤ 1.0×10^2 CFU/g	ISO 6888-1
M2	Presumptive B. cereus	≤ 1.0×10^3 CFU/g	ISO 7932
M2	C. perfringens	≤ 1.0×10^2 CFU/g where relevant	ISO 15213-2
M3 Oils/lipids	Aerobic colony count	≤ 1.0×10^3 CFU/g	ISO 4833-1
M3	Yeasts and moulds	≤ 1.0×10^2 CFU/g	ISO 21527-2
M3	Enterobacteriaceae	< 10 CFU/g	ISO 21528-2
M3	E. coli	Not detected in 1 g, or < 10 CFU/g where an enumeration method is used	Validated detection/MPN method or ISO 16649-2 with an appropriate reporting limit

Category	Parameter	PURE criterion	Method
M3	Salmonella spp.	Absent in 25 g; c = 0	ISO 6579-1
M4 Stable liquids	Aerobic colony count	≤ 1.0×10^3 CFU/ml	ISO 4833-1
M4	Yeasts and moulds	≤ 1.0×10^2 CFU/ml	ISO 21527-1 or -2
M4	Enterobacteriaceae	< 10 CFU/ml	ISO 21528-2
M4	E. coli	Not detected in 1 ml, or < 10 CFU/ml where an enumeration method is used	Validated detection/MPN method or ISO 16649-2 with an appropriate reporting limit
M4	Salmonella spp.	Absent in 25 ml; c = 0	ISO 6579-1
M4	Coagulase-positive staphylococci	< 10 CFU/ml	ISO 6888-1
M4	L. monocytogenes	Absent in 25 ml where legally or risk relevant	ISO 11290-1
M5 Probiotics	Declared organism identity	Conforms to declared genus/species/strain where claimed	Validated molecular/phenotypic method
M5	Viable count	At least declared CFU through shelf life	Validated culture or strain-appropriate method
M5	Salmonella spp.	Absent in 25 g; c = 0	ISO 6579-1
M5	E. coli	Not detected in 1 g, or < 10 CFU/g where an enumeration method is used	Validated detection/MPN method or ISO 16649-2 with an appropriate reporting limit
M5	Coagulase-positive staphylococci	≤ 1.0×10^2 CFU/g	ISO 6888-1
M5	B. cereus / C. perfringens	≤ 1.0×10^3 / ≤ 1.0×10^2 CFU/g unless a declared strain makes the test inappropriate	ISO 7932 / ISO 15213-2
M5	L. monocytogenes	Absent in 25 g where legally or risk relevant	ISO 11290-1

Interpretation notes: aw means water activity. The assigned category, test portion and method shall be recorded. Products for vulnerable groups, products supporting pathogen growth and products within Regulation 2073/2005 may require stricter limits and statutory sampling plans. Intentional cultures shall not be counted as contamination when their identity and role are documented.

ANNEX D – CHEMICAL TESTING MATRIX

Product/ingredient trigger	Panel	Minimum frequency	Method approach	Acceptance
All products	Pb, Cd, total Hg, total As	Initial certification; at least once per 24-month cycle; targeted annual parameter	EN 13805 + EN 15763 preferred	Applicable Regulation 2023/915 / national limit; LOQ target ≤20% of limit.
Any agricultural-origin ingredient	Broad matrix-appropriate pesticide multi-residue panel with targeted additions	Initial and renewal; annual targeted or full panel by risk	EN 15662 + LC-MS/MS and GC-MS/MS; EN 18032:2025 or validated targeted method for relevant highly polar residues	Regulation 396/2005; all detections reported.
High-risk polar pesticides	Glyphosate/AMPA, glufosinate, chlorate/perchlorate, fosetyl/phosphonic acid, ethephon as relevant	Risk-based	Current EURL-SRM method	Applicable MRL/action value.
Cereals, nuts, dried fruit, spices, botanicals	Aflatoxins, ochratoxin A, DON, ZEA, fumonisins, T-2/HT-2 as relevant	Initial and risk-based surveillance	Validated LC-MS/MS or legal-performance equivalent	Regulation 2023/915; sampling under 2023/2782.
Red yeast rice / susceptible fermentation	Citrinin	Each certification cycle and after supplier change	Validated LC-MS/MS/HPLC	Applicable legal maximum.
Herbs, teas, botanicals	Pyrrolizidine/tropane/ergot alkaloids as relevant	Risk-based by species and origin	Validated LC-MS/MS	Applicable legal maximum / PURE specification.
Oils, smoked/dried/roasted products	PAHs, 3-MCPD/glycidyl esters or acrylamide as relevant	Risk-based	Validated GC-MS/MS or LC method	Applicable legal maximum / benchmark.
Marine/animal/high-fat products	Dioxins and PCBs; veterinary residues where relevant	Risk-based	Legally recognised validated method	Applicable EU maximum / MRL.
Imported spices/seeds/extracts	Ethylene oxide + 2-chloroethanol	Origin and alert-history based	Current validated EU/EURL method	Applicable EU residue definition and MRL.

Product/ingredient trigger	Panel	Minimum frequency	Method approach	Acceptance
Extracts/concentrates	Residual solvents	Initial and after process/supplier change	Validated headspace GC or equivalent	Legal requirement / approved specification.
Packaging or environmental risk	Mineral oil hydrocarbons / PFAS as relevant	Triggered or risk-based	Validated method with adequate LOQ	Applicable legal or adopted PURE action level.

ANNEX E – PURE ADDITIVE POLICY

CONTROLLED-LIST RULE
Annex E is part of the effective Standard. ECOGEA shall maintain scientific rationales and a version-controlled decision record. Legal authorisation is always required. A later legal prohibition applies immediately even before the annex is formally amended.

E.1 Prohibited

Prohibited category	Rule
Illegal or non-authorised substances	Any additive, processing aid or novel form not authorised for the intended use, or used outside its legal conditions.
Withdrawn/suspended substances	Any substance whose authorisation has been revoked, suspended or is no longer valid for the intended use.
Titanium dioxide E171	Not accepted; it is no longer authorised as a food additive in the EU.
Six Article 24 warning colours	E102, E104, E110, E122, E124 and E129 are prohibited in all PURE products.
Synthetic colouring in food supplements	Synthetic colours are prohibited in food supplements. Only approved colourants on the PURE positive list may be accepted, with technical justification.
Misleading decorative colour	Any colour used principally to mask poor quality, simulate a valuable ingredient or create a false natural/fresh impression.
Partially hydrogenated oils	Prohibited as ingredients or carriers.
Intentional nanoform without approval	Prohibited unless expressly legally authorised for the use, fully characterised and specifically approved by ECOGEA.

E.2 Restricted – technical justification required

Restricted category	PURE condition
High-intensity sweeteners	May be accepted only where lawfully authorised, clearly labelled and technically justified; the applicant shall explain consumer need and alternatives.
Preservatives	Use only where required by product safety/stability; challenge, stability or historical data shall support the system and level.
Synthetic antioxidants including BHA/BHT/gallates	Product-specific justification, legal compliance and lowest effective use required; alternatives shall be considered.

Restricted category	PURE condition
Sulphites	Only where authorised and technically necessary; allergen declaration and actual level controls apply.
Anti-caking/flow agents	Use shall be necessary for dose uniformity or manufacturing; non-nano status and purity shall be documented where relevant.
Magnesium salts of fatty acids	Restricted to the lowest technically effective level; source and function shall be documented.
Glazing agents and carriers	Full composition disclosure and technical necessity required.
Flavourings and smoke flavourings	Legal status, composition disclosure to the certifier and non-misleading use required; changes in EU authorisation shall be monitored.

E.3 Generally acceptable examples subject to legal use

Examples that may be accepted include ascorbic acid/ascorbates, tocopherols, citric acid/citrates, malic acid, pectins, agar, lecithins, cellulose and HPMC capsule materials, acacia gum, selected starches, glycerol, beeswax/carnauba wax where sourcing and product positioning permit, and non-nano silicon dioxide where technically justified. This paragraph is not an exhaustive authorisation list.

ANNEX F – RISK-CLASSIFICATION MODEL

Dimension	Score 0–3 guidance
1. Intrinsic product hazard	0: stable low-aw product, no vulnerable group. 1: stable but complex matrix. 2: liquid/biological or moderate growth/instability risk. 3: high-moisture/RTE, vulnerable group or significant safety sensitivity.
2. Ingredient and origin risk	0: low-risk, well-characterised EU supply. 1: one moderate-risk agricultural ingredient. 2: several high-risk botanicals/import origins. 3: alert-prone commodity/origin, marine/algal, concentrated or poorly transparent chain.
3. Process and site control	0: certified/robust site, validated controls. 1: adequate documented system. 2: new site/process or material gaps. 3: weak controls, multiple subcontractors or critical process uncertainty.
4. Supplier/compliance history	0: strong history, no material issues. 1: minor issues closed. 2: repeated major issues or frequent changes. 3: serious enforcement, recall, falsification or unresolved failure.
5. Authenticity/fraud vulnerability	0: low value, simple identity. 1: moderate substitution risk. 2: high-value extract/oil/botanical or origin claim. 3: known adulteration history, proprietary blend opacity or extreme price/availability pressure.

Total score: Low 0–4; Medium 5–9; High 10–15. A single score of 3 for safety, fraud/falsification or unresolved legal history may be escalated directly to High regardless of total. The evaluator shall record reasoning and may increase but shall not reduce risk without evidence.

ANNEX G – RESPONSIBLE AND FAIR SOURCING CODE

Requirement	Minimum auditable evidence
Contracts and purchasing	Written, understandable terms; no prohibited unfair trading practice; no unilateral retrospective changes; lawful payment periods.
Pricing and producer impact	Pricing method and deductions transparent; high-risk chains assessed for practices that could drive illegal labour or environmental harm.
Forced labour and trafficking	Prohibited; recruitment fees, retention of identity documents and restriction of movement are not accepted.
Child labour	Minimum-age and hazardous-work rules respected; remediation protects the child and family rather than merely dismissing the child.
Freedom of association	Workers may organise and bargain collectively where lawful; no retaliation.
Non-discrimination and dignity	No discrimination, violence, harassment, intimidation or degrading treatment.
Wages and hours	Legal wage, working-time, rest and overtime requirements met; records reliable.
Health and safety	Hazard assessment, training, PPE, safe equipment, emergency controls, potable water, sanitation and accommodation safeguards where relevant.
Grievance and remedy	Accessible confidential mechanism, non-retaliation, investigation and remediation.
Traceability	Producer/cooperative/primary-processor traceability proportionate to risk; certified volumes reconciled.
High-risk due diligence	Country/commodity screening, additional evidence, worker/producer interviews or independent audit as needed.
Corrective action	Time-bound, root-cause based and verified; responsible disengagement where remediation fails.

G.1 Enhanced fair-trade module

A consumer-facing fair-trade claim requires, in addition to the minimum code: a documented fair-price or premium mechanism; traceable payment or benefit to producers/workers; producer participation or governance where applicable; prohibition of improper deductions; transparent volume reconciliation; and independent verification. An accepted equivalent third-party certificate may satisfy part of this module after benchmarking and status verification.

ANNEX H – APPLICATION AND CERTIFICATION CHECKLIST

☐ Confirm eligible product category and intended EU/national markets.

☐ Submit legal entity, brand, sites, SKUs and GTIN/EAN information.

☐ Submit full quantitative formula including carriers, premixes, shell and processing aids.

☐ Provide specifications and batch CoAs for every ingredient and finished product.

☐ Provide supplier, manufacturer, country of processing and agricultural-origin information.

☐ Complete novel-food, food-supplement, additive, GMO and allergen legal-status review.

☐ Provide manufacturing flow, HACCP summary, cleaning/allergen and batch-release controls.

☐ Provide stability plan, shelf-life evidence and food-contact packaging documentation.

☐ Complete pesticide, heavy-metal, mycotoxin and other contaminant risk assessment.

☐ Complete food-fraud vulnerability assessment.

☐ Complete environmental legal register and site-compliance evidence.

☐ Complete responsible-sourcing risk assessment and supplier evidence.

☐ Submit label, product page and every proposed ECOGEA claim.

☐ Permit independent sampling and provide sufficient sealed units.

☐ Close critical and major non-conformities before decision.

☐ Obtain written certificate and artwork approval before commercial label use.

☐ Notify changes and complete annual surveillance during the 24-month validity period.

ANNEX I – SAMPLING AND CHAIN-OF-CUSTODY REQUIREMENTS

Field	Required entry
Certificate/applicant reference	Applicant, certificate number if existing, sampling plan reference.
Product identity	Brand, exact product, SKU/GTIN, pack size, dosage form.
Batch identity	Batch/lot, manufacture date, best-before/use-by date.
Sampling location	Site/warehouse/retailer/web order, address and stock context.
Sampling date/time	Date and time; production stage if sampled on site.
Units and quantity	Number of sealed units and total mass/volume.
Selection method	Random/systematic/market purchase; positions in lot or run.
Condition	Seal integrity, temperature, visible damage, photographs.
Sample division	Sample A laboratory; Sample B counter-sample; Sample C holder/retention as applicable.
Seal numbers	Tamper-evident seal or equivalent custody identifiers.
Transport	Courier, temperature/light controls, dispatch and receipt times.
Sampler	Name, organisation, signature and conflict-of-interest confirmation.
Laboratory receipt	Date/time, condition, discrepancies and acceptance.
Requested tests	Exact panel, reference methods, legal/PURE criteria and reporting requirements.

The certifier shall retain the signed sampling record with the laboratory report. Any custody deviation shall be evaluated before the result is used for certification.

ANNEX J – APPROVED AND PROHIBITED CLAIMS

J.1 Approved core claim

• Short version: “ECOGEA PURE certified”

• Long version: “ECOGEA PURE certified – independently verified product integrity, traceability and risk-based testing under the ECOGEA PURE Standard.”

J.2 Conditional supporting claims

Area	Approved or conditional wording
Microbiology	“Microbiological suitability verified to the applicable ECOGEA PURE criteria.”
Pesticides/heavy metals	“Independent pesticide and heavy-metal testing reviewed under ECOGEA PURE.”
Origin	“Ingredient origin and traceability independently verified.”
Additives	“Verified free from additives prohibited by the ECOGEA PURE Standard.”
GMO	“No intentional use of genetically modified ingredients; validated testing applied where technically relevant.”
Sourcing	“Responsible-sourcing requirements independently verified under ECOGEA PURE.”
Fair trade enhanced	Wording approved only for products meeting Annex G.1 or an accepted equivalent scheme.

J.3 Prohibited wording

- “Guaranteed contaminant-free”, “zero pesticides”, “100% safe” or equivalent absolute wording.
- “EU approved”, “government certified”, “institutionally guaranteed” or any public-authority implication.
- “Sustainable”, “environmentally friendly”, “climate neutral” or “planet positive” solely on the basis of PURE certification.
- “Fairtrade” or another protected/named scheme claim without current authorisation.
- “GMO-free” without the exact approved qualified wording and market-specific legal check.
- Any claim extending certification from listed products to the entire brand, company, site or range.

ANNEX K – MINIMUM CERTIFICATE CONTENT

Every certificate shall contain enough information to identify the certified scope without ambiguity. At minimum, it shall state:

Field	Required certificate information
Scheme and standard	ECOGEA PURE Standard for Food and Food Supplements, applicable version.
Certificate holder	Legal name and address.
Certified product	Brand, exact product name, SKU/GTIN where available, dosage form and pack formats or approved range.
Formula/scope reference	Controlled formula or specification reference and relevant manufacturing/packing sites.
Certification category	Applicable P-category and any product-specific annex.
Approved claims	Core certification claim and any specifically approved feature statements.
Issue and expiry	Issue date, expiry date and statement that validity is subject to continuing surveillance.
Certificate number	Unique certificate or public verification number.
Status verification	Public registry URL or QR method.
Certification decision	Name or identifier of the independent certifier/decision function and date of decision.
Limitations	Any exclusions, conditions, product-family sampling basis or other material scope limitation.

REFERENCES

Primary legal texts shall be consulted in their current consolidated form through EUR-Lex and applicable national sources. Current official registers and databases shall be used for pesticide MRLs, authorised novel foods, GMO events, nutrition and health claims and food-contact restrictions. The following references support the interpretation and operation of this Standard:

- European Union legal instruments listed in Annex A, including their amendments and consolidated versions current at the assessment date.
- European Commission, SANTE guidance on analytical quality control and method-validation procedures for pesticide residues in food and feed, current 2026 edition.
- EU Reference Laboratories for pesticide residues and for GM food and feed: current validated methods and technical guidance.
- ISO and EN standards listed in Annex B, in their cited editions and amendments.