SCIENTIFIC COMMITTEE ON CONSUMER PRODUCT (SCCP)

Request for an updated scientific opinion on the labelling of 26 fragrance substances. Spin-off from the public consultation (November 2006) on the Commission proposal of regulation of some fragrance substances as partly implementation of SCCNFP opinion n° SCCNFP/0392/00.

1. Background

As a result of the public consultation on perfumery materials, which ended on 27 January 2007, there were further requests and information on other frequent/important allergens than those proposed for regulation, like farnesol, citral, linallol and hydroxyisohexyl-3-cyclohexenecarboxaldehyde. These substances were not part of the consultation, but they all belong to the 26 fragrance substances which should be labelled when present in cosmetic products under certain conditions.

The 26 fragrance substances were introduced into annex III of the cosmetics Directive by the 7th amendment (2003/15/EC) on the basis of the SCCNFP draft opinion (SCCNFP/0017/98) published on 30 September 1999 for public consultation and the final opinion adopted by the SCCNFP during the plenary session of 8 December 1999.

13 of the allergenic fragrance substances listed in this opinion have been frequently reported, as well-recognised contact allergens in consumers and are thus of most concern, 11 others are less well documented. See the lists below from the opinion.

List A: Fragrance chemicals, which according to existing knowledge, are most frequently reported and well-recognised consumer allergens

| Common name | CAS number |
|--|------------|
| | |
| Amyl cinnamal | 122-40-7 |
| Amylcinnamyl alcohol | 101-85-9 |
| Benzyl alcohol | 100-51-6 |
| Benzyl salicylate | 118-58-1 |
| Cinnamyl alcohol | 104-54-1 |
| Cinnamal | 104-55-2 |
| Citral | 5392-40-5 |
| Coumarin | 91-64-5 |
| Eugenol | 97-53-0 |
| Geraniol | 106-24-1 |
| Hydroxycitronellal | 107-75-5 |
| Hydroxymethylpentyl- cyclohexenecarboxaldehyde | 31906-04-4 |
| Isoeugenol | 97-54-1 |

List B: Fragrance chemicals, which are less frequently reported and thus less documented as consumer allergens

Common name CAS number

| Anisyl alcohol | 105-13-5 |
|--|-----------|
| Benzyl benzoate | 120-51-4 |
| Benzyl cinnamate | 103-41-3 |
| Citronellol | 106-22-9 |
| Farnesol | 4602-84-0 |
| Hexyl cinnamaldehyde | 101-86-0 |
| Lilial | 80-54-6 |
| d-Limonene | 5989-27-5 |
| Linalool | 78-70-6 |
| Methyl heptine carbonate | 111-12-6 |
| 3-Methyl-4-(2,6,6-trimethyl-2-cyclohexen-1-yl)-3-buten-2-one | 127-51-5 |

Furthermore, 2 fragrances were additional added

| Oak moss | 90028-68-5 |
|-----------|------------|
| Tree moss | 90028-67-4 |

At that time there were not sufficient scientific data to allow for determination of dose-response relationships and/or thresholds for these allergens. Nevertheless, as an administrative practice the limits of 0.01 and 0.001% respectively for rinse-off and leave-on were set.

Scientific information of general and specific nature has been submitted to DG ENTR in order to ask the SCCP for a revision of the 26 fragrances with respect to further restrictions and possible even delisting. A separate request has already been made for hydroxycitronellal, isoeugenol and the content of peroxides in the limonenes.

2. Terms of reference

- 1. Does the SCCS still consider that the fragrance allergens currently listed in Annex III, entries 67-92, for labelling purposes represents those fragrance ingredients that the consumer needs to be made aware of when present in cosmetic products?
- 2. Can the SCCS establish any threshold for their safe use based on the available scientific data?
- 3. Can the SCCS identify substances where processes (e.g. metabolism, oxidation and hydrolysis) may lead to cross-reactivity and new allergens which are relevant for the protection of the consumer?