



IFRA¹, UEAPME², COSMEBIO³ position paper on fragrance allergens in the framework of Regulation EC No. 1223/2009 of the European Parliament and the Council on cosmetic products.

Helping consumers suffering from skin allergy to manage their risk through relevant and useful information

We are considering in this case, consumers who have unfortunately already been induced to certain skin allergens. To actively help them, the foreseen measures must facilitate these consumers' ability to make adequate choices thus preventing the elicitation of their allergic symptoms. The most efficient and relevant tools should focus on information, information providing these consumers with prior knowledge before choosing to use a cosmetic product containing certain skin sensitizers. Indeed, this information must beforehand warn them of the presence, in the products they are considering using, of possible skin allergens to which they may be intolerant to.

Given the intrinsic nature of elicitation thresholds to each individual, it is essential that the way in which the information is structured helps each individual tailor his management of the risk under consideration.

This information may incorporate several tools such as pictograms, on-pack warnings, web sites and toll free access to consumer help centres. More specifically, for products containing a well establish allergen, we should consider discouraging the sensitized consumer from using the product or encouraging him to consult a specialist such as a primary physician or a dermatologist.

¹**UEAPME** is the employers' organisation representing crafts, trades and SMEs from the EU and accession countries at European level. UEAPME has 80 member organisations covering over 12 million enterprises with 55 million employees. UEAPME is a European Social Partner. UEAPME subscribes to the European Commission's Register of Interest Representatives and to the related code of conduct as requested by the European Transparency Initiative. Our ID number is 55820581197-35. For further information please visit <http://www.ueapme.com/> or follow @UEAPME on Twitter.

¹ **The International Fragrance Association (IFRA)** is the worldwide trade association representing the interests of "fragrance houses", creators, innovators and manufacturers of fragrance compositions and fragrance materials to scent, namely household and personal care products, as well as fine fragrances marketed by the downstream companies. IFRA subscribes to the European Commission's Register of Interest Representatives and to the related code of conduct as requested by the European Transparency Initiative. Our ID number is 14130436110-87 <http://www.ifraorg.org>

³**COSMEBIO®** is the Professional Association for Natural, Ecological and Organic cosmetics. <http://www.cosmebio.org/en/>

Pre-requisites to relevant and useful consumer information

1. The primary target audience consists of those **consumers which have been sensitized** to an allergy inducing substance in order to help them manage their risks and avoid the symptoms of their intolerances.
2. Fragrance ingredients are not the single cause of skin allergies. Therefore, **a uniformed approach (and furthermore non-discriminatory)** must be established to encompass all skin sensitizers contained in products (cosmetics).
3. The information must be **straightforward and easily accessible** for the consumer as well as for the medical practitioner. Given its limitations, labelling must be used selectively whilst offering an optimal link to digital information.
4. The information must be **proportionate** and mirror, if possible, the various levels of concerns highlighted by the scientific and medical community.
5. In order to avoid any form of consumer misunderstanding, the communication tools for providing this information must be **rigorously identical across the industry** under the regulation, irrespective of the distribution channels or product categories.
6. The tools retained must be convenient, ***manageable by all concerned in the supply chain***, easily adaptable and capable of scaling to future regulatory requirements.
7. Within limits, the information as well as the tools for its communication should take into consideration best practices in place in other fast moving consumer goods categories. Indeed, the consumer has a holistic view and should enjoy the benefits of a relatively harmonized/consistent approach to risk trade-offs and their readings on how to deal with them.

An actionable proposal

Addressing to aforementioned pre-requisites, we could offer a hybrid approach, combining direct on-pack information as well as a database link to the brand/product.

1. As already established through the application of the 7th revision of the Cosmetics Directive, certain fragrance allergens may be added to the list of ingredients labelled on pack. In this case, we would advise to add the “allergens of concern” (according to annex 13.5 of the July 2012 SCCS opinion). These substances are the ones frequently prevalent in the reported cases of skin allergies.
2. A straightforward and descriptive pictogram will draw consumers’ attention to a brand/product specific web based data bank listing the ingredients in addition to the full disclosure of skin sensitizers contained in the product. This website will enable downstream consumer product companies to add any relevant information, notably the one relative to the presence of allergens and guidance on applications and warnings.

Supporting comments to the proposal.

Addressing the consumer's need for managing risk mitigation. For the key audience, defined as consumers previously sensitized, allergens of concern which are the source of the majority of the reported skin allergies, would be readily accessible on pack. Easily accessible web based information will help them better mitigate their risk by giving them the opportunity to select, in advance, products which they may use and therefore, purchase. In addition, the voluntary recommendations provided by the brands will generate a substantial benefit for these concerned consumers

Addressing needs for a pragmatic support to the medical community. A simplified access to the comprehensive composition list including the presence of skin allergens will be a valuable asset for the medical community. On-line consultation of information will even offer the option to analyse the patient's extensive products usage without the burden of referring to the physical products.

Addressing the need for a uniform, identical industry sector approach. The use of a comprehensive product composition list including the presence of skin allergens, prevents discrimination of ingredients within an industry sector.

Addressing the need for an industry wide actionable solution. It is now commonly recognized that web based media is the simplest and most ubiquitous tool used across the industry and particularly by SMEs. Furthermore, correcting/amending the information will be possible in real time and at a fraction of the cost of managing the need to reprint labels and worse, recall mislabelled products.

Addressing the need for a flexible and scalable system, capable of harnessing long term regulatory requirements as well as ever expanding consumer information aspirations. Endorsing a simple, flexible medium, easy to up-date and maintain such as offered on-line, will provide an adaptive tool in the face of regulatory requirements. Moreover, any modification of the information due to evolving regulatory requirements, would be possible in real time at minimum cost. Voiding this solution would result in weakening further the effectiveness of on-pack labelling.

Addressing the need for the coherence with other consumer goods sectors. This dual access to information remains coherent with other sectors (such as detergents). Indeed, labelling on pack the substances most frequently identified in the reported cases of contact allergies is a way of maintaining coherence with the regulatory requirements of other sectors.

Addressing the need for evolving distribution channels. The share of sales through internet is increasing steadily and particularly for some cosmetic products. The information using electronic means is, in this case, the only way to communicate with potential consumers.

Addressing the impact on the environment. The more the information is digitally generated, the more this will avoid producing and managing changes of artworks. As a consequence, through reduced wastes, the environmental footprint will be enhanced.

Addressing legislative constraints. Based on legal reviews, this proposal remains within the framework of the Cosmetics Regulation and can be adopted through comitology. Adopting this proposal does not require drafting a new legislative proposal.

Addressing implementation needs. This proposal also does not require a long lead time for its implementation as the industry already widely uses the technology.