

Att.: EU- Commission  
Directorate General Enterprise and Industry  
Unit F/3, Cosmetics and Medical devices  
Brussels

Copenhagen 19. January 2007

**Response to public consultation on perfumery materials in the framework of Council Directive 76/768/EEC relative to cosmetic products (deadline 27 jan 2007)**

Fragrances are one of the most frequent causes of allergic contact dermatitis among eczema patients as well as in the general population in Europe. Even though many fragrance ingredients have been described as allergens only a minor part is of special concern being very potent allergens and/or being a frequent cause of contact allergy. Such allergens should be controlled by limits in the cosmetics directive or in very special cases prohibition, as the only means of providing effective prevention of an economically and socially disabling disease.

The current proposal containing suggestions for limitations of some key fragrance allergens is therefore a very important step. The opinions on which the proposal is based are several years old, in the mean time more evidence has accumulated to be considered and an updated risk assessment is needed for:

**Cinnamal, CAS no 104-55-2**

It is a potent allergen. Relevant restrictions are important. Evidence that a restriction of 0.1% is too high has been published (*e.g. Bruze M 2003; Schnuch A 2004; Gerberick FG 2001; review of data: Cocchiara J 2005*).

**Cinnamyl alcohol, CAS 104-54-1**

Is less potent than cinnamal but is metabolised in the skin into cinnamal. A restriction of 0.8% is too high (*review of data: Letizia CS, 2005*).

**Hydroxycitronellal, CAS 107-75-5**

One of the most frequent allergens. A restriction of 1% is too high (*e.g. Svedman 2003; Schnuch 2004*)

**Isoeugenol, CAS 97-54-1**

A potent and frequent allergen. No decrease in sensitization to the substances has been seen even though the recommended IFRA concentration has been 0.02% since 1998. Thus a restriction of 0.02% is too high (*eg. Bruze 2005; Schnuch 2004; White 2006*)

**d-Limonene, CAS 5989-27-5**

Oxidization products are frequent allergens. Restrictions should be considered (*eg. Matura 2005/2006*)

Restrictions of *other frequent/important allergens*, which are not part of the consultation, should be considered e.g: for Farnesol, Citral and Linalol (*e.g.Schnuch 2004; Frosch 2002;2005; Matura 2006*).

Implementation of the restrictions of one of the most frequent contact allergens *hydroxyisohexyl-3-cyclohexenecarboxaldehyde*, is most needed. This is not part of the current consultation, but an opinion from 2004 has provided recommendations for limitations in use. It is of concern that no decision has been taken and the use can continue unrestricted.

Sincerely yours,

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