

FAQ – Frequently Asked Questions About the Boycott of the Proposed International Fragrance Association’s (IFRA) 40th Amendment

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This FAQ was written by an international panel of concerned essential oil and natural perfumery professionals and released by the Artisan Natural Perfumers Guild (ANPG). The Guild is a U.S.-based international consortium of natural perfumers, suppliers and associates. The ANPG is supporting the boycott in the USA, where most of the members reside, and believes this effort to open up a dialogue with IFRA and other agencies and organizations is crucial for the future of the use of natural aromatics, especially for small businesses.

Note: Links for all of the organizations listed in this document are in the Addendum.

- 1. Why has Cropwatch ⁽¹⁾ called for a boycott on the 40th Amendment to the International Fragrance Association’s IFRA’s ⁽²⁾ Code of Practice (CoP) ⁽³⁾?** Cropwatch fully supports reasonable ingredient restriction for reasons of consumer safety. However, this proposed Amendment arguably discriminates against small companies by its excessive paperwork requirements and reduces the former art of perfumery to a computer exercise. Further, the progressive restrictions on natural ingredients are creating a future scenario of purely synthetic fragrance. Cropwatch, which keeps an eye on the in-place and proposed legislation, realized that the Amendment was going to be quickly adopted without public discussion, and called for a boycott until such a discussion could take place. The Artisan Natural Perfumers Guild ⁽⁴⁾ supports the above statements.
 - Please note to download the 40th Amendment, you need to go to the News and Information page ⁽⁵⁾, then click on "Code of Practice and Amendments" on the left. It still says News & Information, but you will see Download Part 1 of the 40th Amendment etc. There are three parts to download.
- 2. What is Cropwatch?** Cropwatch is a non-financed Independent Watchdog to the Aroma trade
- 3. What is IFRA?** The scope of IFRA can be found on its website. It is a trade association that decides policy guidelines for its members. IFRA takes into account the findings of the Research Institute for Fragrance Materials (RIFM) ⁽⁶⁾ – an organization set up to be independent from industrial influences.
- 4. What is the IFRA CoP?** The CoP contains IFRA’s policy guidelines, which can be viewed on their website. The guidelines include the “Standards” - a list of essential

oils, absolutes and aromachemicals that either should not be used in fragrances, or may be used only at a specified maximum level. For the purposes of this FAQ, only natural aromatics will be addressed. Some of the aromachemicals are found in many essential oils. In the 40th Amendment, there are 11 categories of product, each with a different exposure maximum.

5. **What are the repercussions of violating the IFRA CoP?** If you are an IFRA member: to be named and shamed on the IFRA website. Member or not, it is conceivable that not following the CoP could affect your Public Liability Insurance and a court of law might be persuaded to find against non-conformists, in the case of your commodity adversely affecting a customer's health & well-being. IFRA Amendments profoundly affect the workings of the industry because lawyers, insurance brokers, regulatory affairs managers etc., in virtually all companies dealing with fragrances and cosmetics insist that they are followed, whether IFRA members or not.

6. **Do all fragrance companies follow IFRA's CoP?** No, but most do, especially the larger ones. The CoP used to be voluntary and as such (we believe) worked well. Now to follow to the letter it is mandatory for membership of IFRA itself and for membership of bodies such as EFFA (European Flavour & Fragrance Association) (7)

7. **Is there a big business/small business divide on this issue, and for what reason?** The logical conclusion is that the big corporate aroma companies (Symrise, Givaudan, IFF, Clarins, Proctor & Gamble etc.) have the economic muscle to employ teams of staff to cover the quantity of red tape generated by this amendment, which gives them a commercial advantage over potential competition (i.e. the smaller companies). Coincidentally, toxicologists employed by some of the corporations shaped the QRA approach implicit in the 40th amendment, something that should be open for discussion, and will be if the boycott and call for discussion succeeds.

8. **If I don't have a detailed knowledge of essential oil chemistry, how can I adhere to the IFRA CoP?** Seek advice from your professional organization or trade association, which may or may not be able to assist, due to lack of expertise or financial resources. Cropwatch <mailto:info@cropwatch.org> staff tries to answer every enquiry received.

9. **What other government or trade entities besides IFRA are involved in regulating essential oils and fragrance materials?** Depending on your place of residence you should check out the activities of REXPAM ⁽⁸⁾, RIFM, SCCP ⁽⁹⁾, FDA ⁽¹⁰⁾, COLIPA ⁽¹¹⁾, IFSCC ⁽¹²⁾, EFFA and many more.
10. **What is the EU?** To selectively quote from Wikipedia: “The European Union (EU) is a supranational and intergovernmental union of 27 democratic member states in Europe. The European Union was established under that name in 1992 by the Maastricht Treaty.” The European Parliament, based in Brussels, has increasing legal powers over its member states, which are required to implement EU directives ⁽¹³⁾ through their own legal system if they wish to remain members. *According to Wikipedia:* A **directive** is a collective legislative act of the European Community which requires member states to achieve a particular result without dictating the means of achieving that result.
11. **What are the EU laws that impact the use of essential oils in cosmetics and fragrances?** Many of the relevant regulations are contained within the EU Cosmetics Directive 76/768/EEC ⁽¹⁴⁾ which has been amended approximately 50 times and is now to be simplified. The Scientific Committee on Consumer Products (SCCP) publishes Opinions ⁽¹⁵⁾ which generally become EU directives. Many of these, such as the Furocoumarins Opinion, have major implications for essential oils. Also affecting essential oils in Europe, is the Biocidal Products Directive (BPD) ⁽¹⁶⁾.
12. **If I live in an EU member state, what are the repercussions of not adhering to these regulations?** There are legal repercussions (which include “duty of care” under Health and Safety Law) and these may vary from country to country, since each EU state still has its own legal system. In general, there are few resources to effectively police these requirements, since the lab testing required is costly. However, high-profile businesses may be targeted.
13. **If I don’t live in an EU member state, should I be concerned about any of the EU regulations?** Yes. Global Harmonisation ⁽¹⁷⁾ initiatives mean that all nation states will eventually have equivalent legislation. In the US, the Global Harmonization System of Labeling & Classification of Chemicals (GHS) ⁽¹⁸⁾ will come into force in 2008. Systems such as this were forerunners of the extensive regulations that exist in Europe today, so the notion that “it won’t happen here” is highly optimistic.

14. **What do the sum of the IFRA and EU guidelines or regulations mean to me, the farmer or distiller or industry that provides natural aromatics in raw or finished form?** Under health and safety regulations in most countries, you have a duty of care to yourself, your employees & your customers. Observing accepted industry norms and codes of practice, provided they are sound and sensible, should therefore be advantageous to all.
15. **What do the sum of the IFRA and EU guidelines or regulations mean to me, as a small business creating perfumes, toiletries or aromatherapy products?** See #14 above. In order to protect workers, most countries have a framework of health and safety law, backed by a system of enforcement, analogous to those parts of the criminal law seeking to protect citizens from other forms of violence. In addition, people injured as a result of their work generally have the right to sue their employers in the civil courts for negligently causing such injury, the onus being on the injured party to prove negligence. Almost all countries have their own legislation, within often widely differing court systems.
16. **What do the sum of the IFRA and EU guidelines or regulations mean to me, the consumer of commodities containing fragrances/natural aromatic ingredients?** These should give you a measure of health information and protection. However there are issues such as the public right to choose (natural perfumes etc) which need to be explored. Many perfume lovers have discovered that numerous classic fragrances have been reformulated to meet the stringent regulations, and the scent has been “destroyed” in the process. They often voice their displeasure on internet forums, and mounted an email campaign to the historic perfume house of Guerlain, to use one example (documented in Luca Turin’s blog (which has since ceased publication), and on the Perfume of Life forum ⁽¹⁹⁾ (where this subject frequently comes up), asking that perhaps just warning labels would suffice. They mourn the loss and destruction of what they consider works of art.
17. **What is a likely future scenario?** It is stretching the imagination to believe that appropriate authorities will effectively police the aroma trade or that Internet trading in essential oils and natural products will come under any effective scrutiny. Our take on this is that we are in danger of descending into regulatory chaos.
18. **Are there simple alternatives, i.e. warning labels to the IFRA/EU directives?** No. You must take in the whole package of regulations and fight to change those parts that defy common sense or adversely affect small businesses.

19. How can I help support the Cropwatch petition against the Amendment?

1. Sign the petition against 40th IFRA Amendment (20) at:
<http://www.ipetitions.com/petition/ifra40/index.html>
2. Encourage your essential oil supplier/distiller or natural products producers & traders to join Cropwatch - they are the only organization supporting producers to fight regulatory restriction of natural products.

Addendum to this FAQ:

1. Links to Organizations

1. Cropwatch <http://cropwatch.org>
2. IFRA <http://www.ifraorg.org>
3. IFRA Code of Practice <http://www.ifraorg.org/News.asp>
4. Artisan Natural Perfumers Guild <http://artisanaturalperfumers.org>
5. IFRA News <http://www.ifraorg.org/News.asp>
6. RIFM Research Institute for Fragrance Materials <http://www.rifm.org/rexpan.asp>
7. EFFA European Flavour & Fragrance Association <http://effa.be>
8. REXPAN RIFM's Expert Panel <http://www.rifm.org/rexpan.asp>
9. SCCP Scientific Committee on Consumer Products
http://ec.europa.eu/health/ph_risk/committees/04_sccp/04_sccp_en.htm
10. FDA Federal Drug Administration <http://fda.gov>
11. COLIPA The European Cosmetic Toiletry and Perfumery Association
<http://www.colipa.com/site/index.cfm?SID=15588>
12. IFSCC The International Federation of Societies of Cosmetic Chemists
<http://80.168.111.36/servlet/IfsccDisplay?purpose=home>
13. EU Directives <http://en.wikipedia.org/wiki/Directives>
14. EU Cosmetics Directive 76/768/EEC <http://eur-lex.europa.eu/LexUriServ/site/en/consleg/1976/L/01976L0768-20060809-en.pdf>
15. SCCP Opinions
http://ec.europa.eu/health/ph_risk/committees/04_sccp/sccp_opinions_en.htm
16. BPD Biocidal Products Directive <http://ec.europa.eu/environment/biocides/index.htm>.
17. Global Harmonization <http://www.globalharmonization.org/>
18. GHS Global Harmonization System of Labeling & Classification of Chemicals
<http://hazmat.dot.gov/regs/intl/globharm.htm>
19. Perfume of Life Forum <http://perfumeoflife.org/index.php?showforum=6>
20. Petition asking for a boycott of the 40th Amendment to IFRA
<http://www.ipetitions.com/petition/ifra40/>

2. List of Oils and Absolutes Restricted or Prohibited

Essential Oils and Absolutes Restricted or Prohibited by the proposed IFRA CoP:

Listed on the following pages are the essential oils and absolutes that are affected by IFRA, either because they are listed directly, or because they contain listed chemicals. Including essential oils prone to oxidation, there are some 200 materials impacted by the IFRA Code of Practice. This list has been drawn up to highlight the extensive repercussions of the guidelines, not to suggest that none of the listed oils should be in any way restricted.

Ambrette seed oil	Cananga oil
Angelica root oil	Cangerana oil
Bakul absolute	Cardamon oil
Basil absolute	Carnation absolute
Basil oil (estragole CT)	Carrot seed oil
Basil oil (holy)	Cascarilla oil
Basil oil (linalool CT)	Cassia oil
Bay oil (West Indian)	Cassie absolute
Bergamot leaf oil	Cinnamon bark oil
Bergamot peel oil (distilled)	Cinnamon leaf oil
Betel leaf oil	Cistus oil
Birch tar oil	Citronella oil
Black tea tree oil	Clary sage oil
Boldo leaf oil	Clove oil
Broom absolute	Costus oil
Cabreuva oil	Cumin oil
Cade oil	Davana oil
Calamus oil	Elecampane oil

Elemi oil	Lemon tea tree oil
Fenugreek oil	Lemon peel oils
Fig leaf absolute	Lemon thyme oil
Galangal oil	Lemon verbena oil
Geranium oil	Lemon verbena absolute
Ginger oil	Lime peel oil (expressed)
Ginger lily absolute	Lovage leaf oil
Grapefruit peel oil	Mace oil
Ho leaf oil	Mandarin leaf oil
Honey myrtle oil	Marjoram oil (sweet)
Horseradish oil	Massoia bark oil
Horsemint oil	May chang oil
Huon pine oil	Melissa oil
Hyssop oil	Mustard oil
Jasmine grandiflorum absolute	Myrtle oil
Jasmine sambac absolute	Narcissus absolute
Karo karoundé absolute	Nasturtium absolute
Laurel leaf oil	Nutmeg oil
Lemon balm oil (Australian)	Oakmoss absolute
Lemongrass oil	Opoponax oil
Lemon basil oil	Orange blossom oil
Lemon leaf oil	Orange blossom absolute
Lemon myrtle oil	Orange leaf oil

Orange peel oil (bitter)	Styrax oil
Orange peel oil (sweet)	Sugandha oil
Oregano oil	Tagettes oil
Palmarosa oil	Tagettes absolute
Peppermint oil	Tarragon oil
Perilla oil	Tea leaf absolute
Peru balsam oil	Tejpat oil
Phoebe oil	Thyme oil (thymol CT)
Pimento berry oil	Tolu balsam extract
Pimento leaf oil	Treemoss absolute
Pteronia oil	Tuberose absolute
Rose absolute	Vassoura oil
Rose oil	Violet leaf absolute
Rue oil	Wormseed oil
Sandalwood oil (Australian)	Ylang-ylang absolute
Santolina oil	Ylang-ylang oils
Sassafras oil	Essential oils containing “substantial amounts” of limonene or linalool should have antioxidants added to them. IFRA does not define “substantial amounts”, but adding essential oils containing 20% or more of either or both constituents to this list would grow it by 50-60 further essential oils. Essential oils derived from the Pinacea family should also have antioxidants added to them. This would include a further 25 or so essential oils.
Savin oil	
Savory oil (winter)	
Snakeroot oil	
Spearmint oil	
Spike lavender oil	