

March 7, 2007

This document is a quickly-gathered series of grassroots publications, a FAQ, weblinks to related articles and other materials that will outline and illuminate the intricacies and dangers many in the natural aromatics industry identify as threatening the future use of essential oils, absolutes, concretes and related materials. The industry and regulatory issues in Europe that have declared many of the aromatics in need of banning or severe restriction are, we believe, not set up to correctly and impartially look at natural products, instead studying them, if at all, in light of methodology used on synthetic materials. Please feel free to distribute this document. Any questions, contact anya@perfumeclasses.com

Primary authors: Robert Tisserand, Tony Burfield, Anya McCoy

Many of the articles here, with the exception of the blog reprints were written by a team of concerned natural aromatic industry people. We realize this is a very long, very complicated document. Please realize we are just starting to get a handle on the threats to our freedoms. What is either in place in Europe or on the schedule is not in place here in the United States yet, except for companies selling to the EU. We wish to avoid this overregulation of an industry, while adhering to sound safety practices to protect our customers, and protect our thousands of business, both large and small from another layer of costly, time-consuming bureaucracy.



What is the role of the Natural Perfumers Guild and the Natural Perfumery Institute? The NPG and NPI are supporting the boycott of the IFRA 40th Amendment. Most of our members and students reside here, but 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 worldwide.

It all started in early January....and then a press release and FAQ were released supporting the Cropwatch call for a boycott of the rubber-stamped adoption of the IFRA 40th:

-Boycott Called to Halt Adoption of International Fragrance Association's (IFRA) 40th Amendment by UK-based Watchdog Organization Cropwatch Gains Momentum

-USA- based Natural Perfumers Guild and Natural Perfumery Institute to assist in effort to avoid thousands of small perfumery and toiletry businesses being adversely affected by restrictive, unfair compliance standards.

FOR IMMEDIATE RELEASE: MIAMI SHORES, Fla./February 8, 2007. On February 7, 2007, fragrance and flavor trade magazine *Perfumer & Flavorist* released the results of an online poll showing 85.1% of readers in favor of boycotting proposed fragrance industry guidelines that will heavily limit the use of natural essential oils in perfumes and cosmetics.

Compliance with these guidelines (the IFRA 40th Amendment) requires that listed essential oils and naturally occurring constituents be kept to certain minimal levels in consumer products. At the core of the Amendment are safety issues in regard to skin reactions. The NPG and NPI and Cropwatch fully support sensible safety guidelines to protect the consumer, but do not believe IFRA has proved that many of the essential oils affected present the supposed risk, nor have they allowed input from the impacted concerns, especially small businesses.

Although IFRA guidelines are only mandatory for their members, they have become the industry norm globally. Consequently, the livelihood of many small businesses is being threatened by an organization that does not represent them. Adhering to the complex measures not only requires sophisticated computer software, which most small natural products businesses do not possess, it also unfairly targets natural ingredients. Without a level playing field, these small businesses cannot be expected to compete. Approximately 200 essential oils will be controlled by IFRA if their 40th amendment is ratified.

Previous IFRA guidelines have been responsible for the reformulation of many classic perfumes, essentially destroying works of art that existed in liquid form. It is asserted that perhaps a warning label would have sufficed in allowing the original perfume, scent intact, to remain on shelves. Just as demand for natural toiletries and fragrances is growing worldwide, the 40th Amendment could do damage from the level of growers, distillers, up to suppliers and manufacturers. The end result may be the destruction of businesses and the absence of genuine naturally scented shampoos, creams, lotions, perfumes and soaps from store shelves.

To illustrate how the existing and proposed regulations from IFRA do not make sense, NPG President and NPI Founder Anya McCoy recently blogged on Peanuts vs. Perfume. Peanuts can kill susceptible people, yet their sales are unrestricted: Some perfumes may cause a rash, yet the International Fragrance Association's (IFRA) 40th Amendment wants to severely limit the public's access to them. Consumers

are allowed to make informed decisions about peanut products, yet with IFRA and EU (see the related FAQ) guidelines and regulations in place, consumers will no longer have the freedom to make informed decisions about which scented products they wish to use. Access to aromatherapy essential oils may also be limited.

The NPG and NPI believe the amendment may be unreasonable because the measures are based on questionable scientific premises, and they are decided behind closed doors without any possibility of public discussion or debate. Since the call for a boycott was proposed two weeks ago by little-guy Cropwatch, 549 people have signed an online petition, backing the challenge to the Goliath IFRA. <http://www.ipetitions.com/petition/ifra40/signatures.html>

Therefore, the NPG and NPI join Cropwatch in asking for a moratorium on the IFRA 40th amendment, until these issues have been fully addressed. We ask that a review of the scientific methodologies that were used in the original determinations of skin sensitization be examined, that the compliance requirements be reviewed, and that warning labels on products be considered in place of prohibition or restriction.

CONTACT:

Anya McCoy, President

Website: www.naturalperfumers.com and www.perfumeclases.com

KEYWORDS: International Fragrance Association, IFRA, 40th Amendment, boycott, Cropwatch, Natural Perfumers Guild, Natural Perfumery Institute, perfume, fragrance, natural, essential oils, toiletries, consumer, Tony Burfield, Robert Tisserand, Anya McCoy

SOURCE: Natural Perfumers Guild, Natural Perfumery Institute

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

This FAQ was written by an international panel of concerned essential oil and natural perfumery professionals and released by the [Natural Perfumers Guild](#) (NPG). And the [Natural Perfumery Institute](#) (NPI). The Guild is a U.S.- based consortium of natural perfumers, suppliers and associates, all involved in the natural fragrance industry. The Institute is an education site for professional perfumery development of students worldwide.

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 because 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://naturalperfumers.com>
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/IfscDisplay?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/>
21. [Natural Perfumery Institute](#)

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

Angelica root oil

Bakul absolute

Basil absolute

Basil oil (estragole CT)

Basil oil (holy)

Basil oil (linalool CT)

Bay oil (West Indian)

Bergamot leaf oil

Bergamot peel oil (distilled)

Betel leaf oil

Birch tar oil

Black tea tree oil

Boldo leaf oil

Broom absolute

Cabreuva oil

Cade oil

Calamus oil

Cananga oil

Cangerana oil

Cardamon oil

Carnation absolute

Carrot seed oil

Cascarilla oil

Cassia oil

Cassie absolute

Cinnamon bark oil

Cinnamon leaf oil

Cistus oil

Citronella oil Clary

sage oil Clove

oil

Costus oil

Cumin oil

Davana oil

Elecampane oil

Elemi oil

Fenugreek oil

Fig leaf absolute

Galangal oil

Geranium oil

Ginger oil

Ginger lily absolute

Grapefruit peel oil

Ho leaf oil

Honey myrtle oil

Horseradish oil

Horsemint oil	Melissa oil Mustard
Huon pine oil	oil
Hyssop oil	Myrtle oil Narcissus
Jasmine grandiflorum absolute	absolute Nasturtium
Jasmine sambac absolute Karo	absolute Nutmeg
karoundé absolute	oil Oakmoss
Laurel leaf oil	absolute Opoponax
Lemon balm oil (Australian)	oil
Lemongrass oil	Orange blossom oil
Lemon basil oil	Orange blossom absolute
Lemon leaf oil	Orange leaf oil
Lemon myrtle oil	Orange peel oil (bitter)
Lemon tea tree oil	Orange peel oil (sweet)
Lemon peel oils	Oregano oil Palmarosa
Lemon thyme oil	oil Peppermint
Lemon verbena oil	oil
Lemon verbena absolute	Perilla oil
Lime peel oil (expressed)	Peru balsam oil
Lovage leaf oil	Phoebe oil
Mace oil	Pimento berry oil
Mandarin leaf oil	Pimento leaf oil
Marjoram oil (sweet)	Pteronia oil Rose
Massoia bark oil	absolute Rose
May chang oil	oil

Rue oil	Ylang-ylang oils
Sandalwood oil (Australian)	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
Santolina oil	
Sassafras oil	
Savin oil	
Savory oil (winter)	
Snakeroot oil	
Spearmint oil	
Spike lavender oil	
Styrax oil	
Sugandha oil	
Taget oil	
Taget absolute	
Tarragon oil Tea	
leaf absolute	
Tejpat oil	
Thyme oil (thymol CT)	
Tolu balsam extract	
Treemoss absolute	
Tuberose absolute	
Vassoura oil	
Violet leaf absolute	
Wormseed oil	
Ylang-ylang absolute	

from: <http://anyasgarden.blogspot.com>

Friday, January 26, 2007

Freedom to Choose -- and Use -- as Informed Consumers

**Headline: EU Issues Plastic Bubble Pods for Everyone –
Protection from Everything Guaranteed**



OK, let's get serious.

First thing I must state is that no natural perfumer, or traditional perfumer I know, desires that any product they create would cause a rash, irritation, allergy or respiratory problem in the consumer. Or themselves, for that matter, since we deal with the essences every day. The user of natural aromatics, whether they are for personal or professional use just wants something that smells wonderful, puts them in a good mood, and has that deeply wonderful gestalt that only comes from nature. We also recognize that some naturals can cause problems because of their chemical makeup. They're also after some synth oils created in a lab, but I'm here to focus on the naturals, since they let a lot of the synths slid into use without proper review.

Are you a niche, boutique perfumer who uses either all natural aromatics, or, perhaps some synthetics in your perfumes? This is for both of you, even though the focus of this blog entry will focus on naturals, because they are the heart of my business. The Amendment I am protesting (see below) will make regulatory compliance a nightmare for all of us.

IFRA, the International Fragrance Association, was founded in 1973 "to represent the collective interests of the fragrance industry worldwide." One of the primary goals of IFRA is self-regulation of the industry, which is voluntary. They believe

that self-regulation is the primary way to allow the industry to operate without having to address laws on a country-by-country basis, which, admittedly, could be unwieldy.

Based on scientific evidence, which many challenge on various grounds, IFRA has either prohibited, restricted or allowed numerous aromatics, both natural and synthetic to be classified by their Standards. Each year, more and more aromatics are added to the list of prohibited or restricted.

Let's talk common sense for a minute. The EU (European Union) legislators have gone hog wild with taking up the cause of IFRA, making many of the previously-self-regulated aromatics verboten by passing laws (in direct opposition of IFRA's original goal.) The EU has been criticized for regulating many wonderful food and fragrance items out of existence.

Their need to be Big Brother, the womb-to-tomb Protector of Everyone to the point of, in a fantasy, placing everyone inside a plastic bubble so that no pollen, fragrance, raw milk product or other "suspect" product causes damage to poor little you, you, simple uneducated citizen, you who are unable to make a decision for yourself as to what goes in your body or on your skin.

Several venerable perfume houses have announced that they've reformulated their classic parfums to comply with EU regs. What a travesty. That is destroying a work of art. Why not just sell the perfume with a warning tag, much like we see on cigarettes, alcohol, food that contains possible allergens, etc? Why the wholesale banning? We are not children, we are able to make decisions for ourselves, and if we wish to tempt a rash to rise on our skin, that's our choice.

As a natural perfumer, I am concerned that they will try to legislate the natural essences so that a license is needed, or a prescription in the case of an aromatherapy product. Why focus on naturals so much, while allowing so many synthetic fragrances to go to market untested? There is something very, very skewed about all this.

From the online petition site put up by Tony Burfield, who has led the fight against the proposed 40th Amendment:

We the undersigned petitioners oppose the 40th IFRA Amendment to its CoP, the unnecessary red tape it will create, and the other widespread negative implications for all natural aromatics/essential oil users, across a range of professions. We will strongly object to any subsequent adoption of the Amendment into the EU regulatory process. and we request that IFRA reconsider their position, preferably by debate with all affected parties.

Tony Burfield of <http://cropwatch.org> has taken up this fight for many years. Based in the UK, Tony is a perfume chemist and activist, looking out for issues related to the natural aromatics trade, including regulatory issues, sustainability of natural resources among others. He managed to put a large, sharp pin in the side of IFRA last week, causing them to issue their first-ever press release on the subject of unfair bias towards naturals.

Tony called for a boycott of IFRA. A major industry website carried an article on the issue. Allured Publishing, the major flavor and fragrance industry publisher in the world, is conducting a poll on its Perfumer and Flavorist magazine website, the results to be announced on February 7th. Scroll down to the lower left corner to see the poll.

Here is the original call for a boycott: <http://cropwatch.org/40thpetition.htm> which covers many more details that can be covered in this blog.

Here's Tony's latest statement, with the link to where you can sign the petition:

At last we have a petition up - protesting against the 40th IFRA amendment and its implications for all natural aromatics/essential oil users.

This isn't really just about Cropwatch, its about taking a stand against one of the prime movers (IFRA) in a regulatory process, which (intentionally or otherwise), is slowly phasing out the use of natural materials in favour of synthetics in cosmetics/fragrances. We can see a similar process going on - the phasing out of natural aromatic materials - in many other areas - biocides, over-the-counter medicines, household products etc. etc.

Please, please, please help us by signing this petition.
<http://www.ipetitions.com/petition/ifra40/>

A good showing here in particular can help us enormously by proving that David (us) can triumph over Goliath (the Corporates). A bad showing means that we can be dismissed by the authorities as insignificant.

Please help us by spreading the word on this petition to as many groups and individuals as possible.

Cheers,

Tony

from <http://anyasgarden.blogspot.com> feb 1, 2007

This List Ain't Peanuts - 130 - 200 Oils Headed for Restriction or Prohibition



Peanuts can kill. To those who have a severe allergy, merely inhaling the dust, or eating a mouthful of food with peanuts in it, can die within minutes from severe anaphylactic shock. Parents of vulnerable children check every day the child is carrying an EpiPen to inject themselves with if they are accidentally exposed to peanuts.

Yet, our store shelves are stocked with them, they're sold most places people gather, and they're a staple food, unrestricted by limitations or prohibition for the most part. Some schools do not allow PB&J sandwiches, and I believe airlines have stopped giving out free bags of peanuts.

Not many know this, but peanuts can also contain the deadly aflatoxic fungus, which is carcinogenic.

Aflatoxin - noun: a potent carcinogen from the fungus *Aspergillus*; can be produced and stored for use as a bioweapon

toxin from fungus: a toxin produced by some molds in crops, especially peanuts.

Nice nuts.

So who is nuts now?

You can vote on the nuttiest of regulations by visiting The Petition to Boycott the 40th Amendment to IFRA and adding your name to the list of concerned international citizens who are opposed to IFRA adopting this amendment without public discussion or debate.

<http://www.ipetitions.com/petition/ifra40/signatures.html>

(Note Mar 7, 2007 – the following poll is closed, much intrigue, read on.)

There is also a poll at Perfumer and Flavorist magazine <http://perfumerflavorist.com> where you can weigh in on the subject, and I urge you to read more about it by visiting Cropwatch, the organization that is organizing this boycott in an effort to stop the railroading through of the restrictions or outright prohibition of hundreds of natural essential oils and absolutes. Safety should come first with the use of any volatile substance, which these oils are, but how in the world can peanuts be so widely available, and they won't allow a bit of excess lemon in a perfume? Won't warning labels suffice? Are we all to be treated as idiotic consumers, not able to make an informed choice?

Yes, I know -- your eyes may glaze over when you read all of the technical details on Cropwatch. But just remember this -- peanuts kill, oakmoss may give you a rash. Yet oakmoss is severely limited in allowed maximums, and it has destroyed many classic perfumes, as the manufacturers have had to change their formula to meet the standards of IFRA. Nonsense bureaucracy gone amok.

Sidebar: One reason the 40th Amendment is being opposed is the incredible amount of paperwork and expensive software it will require for compliance.

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.

Including essential oils prone to oxidation, there are some 200 materials impacted by the IFRA Code of Practice.

Peanut butter and jelly sandwich, anyone? Hold the rose petal jam, IFRA thinks it might harm you.

from <http://anyasgarden.blogspot.com> Feb. 13, 2007

Tuesday, February 13, 2007

UPDATE Feb. 15, 2007 Cropwatch v. IFRA 40th Amendment Poll Reopened -- no, actually, it's been closed unceremoniously

POLL CLOSED AGAIN. No explanation, no links left. So, the following post is moot, but the situation is interesting.

Perfumer and Flavorist magazine has decided to extend the poll by reopening it for votes. The new deadline is March 5th. You can read the editor's letter about this at: <http://www.perfumerflavorist.com/news/5761601.html>

At first I thought the original poll was going to be tossed out for the new one, but the editor assured me today that the results are being carried over. You can't vote this time if you voted previously, which is not spelled out on the website, so if you have already voted, and care about the issue, circulate this information to other interested folks. You have to go to the main page to vote.

Anyway the new results go, it looks good for Tony and Cropwatch
<http://cropwatch.org>

update: P&F explains why they pulled the poll, with letter from IFRA

Reader Feedback – Poll Fuels a Controversy

[February 21, 2007] <http://perfumerflavorist.com>

Little did we know when we launched our new e-newsletter P&Fnow in January that we would cause a firestorm in the industry over a poll that accompanied a story on IFRA's 40th Amendment.

This poll asked readers to give their view on two opposing sides of the issue. After posting the initial poll results we received numerous letters citing the fact that the poll allowed individuals to vote multiple times. Hoping to correct this situation, we relabelled and reposted the poll.

Almost immediately we received further letters from readers asking that the poll be removed. Among those was a letter from IFRA's director general, Jean-Pierre Houry, which he asked we print (see below). Those opposing the amendment felt we reposted the poll so that the other side could place additional votes, which was not the case, and wanted the initial results to stand. Those in favor of the amendment maintained that the poll could not be used as a true barometer of the industry because of its unscientific nature. With this in mind we removed the poll from our Web site.

Perfumer & Flavorist's goal is to be an advocate for and to report the developments in the industry. Instead, we unintentionally created a wedge,

further dividing two deeply committed organizations. We regret any controversy or ill will that running the poll and subsequent results might have caused.

-P&Fnow

TO THE EDITOR:

We were very surprised and disappointed to see the so-called Cropwatch “poll” on the Newsletter website, which resulted in pitting one segment of the fragrance industry against another. Instead of organizing an objective, informative and honest forum for the discussion of IFRA’s new QRA methodology, and what it means for the fragrance industry, this exercise became an immediate focus of controversy, fueled by a call from one segment to “stuff the ballot box.”

IFRA believes that consumer health and environmental issues are not negotiable and must be addressed in a serious and consistent way. The position espoused by Cropwatch is diametrically opposed to this philosophy. In addition, the opportunity for manipulation of your poll has undermined any potential value.

As we have already pointed out, the QRA represents scientific progress in assessing the safety of fragrances and fragrance ingredients. The QRA has been developed by well-respected experts from industry segments, both large and small, and recognized independent scientific authorities. We request the opportunity to explain to P&F readers why we have moved to the QRA and why it represents significant scientific progress over the former IFRA approach, in an article or an interview in your magazine.

IFRA is always open to collaborate with serious and responsible organizations having as an objective the development of the fragrance industry, but we strongly object to attempts by any special interest group that would put at risk the health of consumers and the protection of the environment.

-Jean-Pierre Hourri Director General IFRA

<http://www.basenotes.net/columnists/20070223cropwatchvsifra.html>

Guest Columnist Tony Burfield: Perfumers & the 40th IFRA Amendment.

by Tony Burfield, first published on 23 February 2007. Reprinted with permission.

Note about acronyms in this article: Anya McCoy from the Artisan Natural Perfumers Guild has provided a link to explain some of the acronyms in this article. See the end of the article.

A Perfumers Lot.

You could be forgiven for thinking that perfumers are becoming a threatened species. Opportunities for working perfumers are disappearing as dinosaur eats dinosaur in the fragrance world, and small perfume companies fight to hold their places amongst a background of commercial takeovers and mergers.

Something else is happening too. In living memory, distinguished perfumers once led fragrance companies, or were, at least, members of the company's board. Now, salespeople, marketeers and accountants invariably head up aroma companies, and these very same individuals also seem to populate perfumery societies & associations, leaving the perfumers relegated as the 'back-room boys' of the trade, with a pecking order status slightly under the regulatory affairs manager, or the perfume evaluator.

Not only that, but perfumers, as the once-outspoken artistes of the aroma trade, have now been transformed to subordinate drones. Speaking out nowadays can cost your job, and job security in today's perfumery trade is not in good shape. If you are a perfumer working in Europe, EFFA's storm troopers will probably have already impressed on your professional society or trade association – perhaps even via a personal visit - that your company must obey the EFFA Code of Practice (CoP) to the letter. It will have also been impressed on your association that talking to the media is best left to EFFA 'experts' (following some allegedly unhelpful remarks made to the media by perfume company officials over synthetic musks, a few years previously). If you are a perfumer belonging to a trans-international company, your company will be distinctly aware of IFRA's naming and shaming policy for transgressing members who market perfumes not in compliance with IFRA's Standards.

The perfumers' workload of weekly customer briefs nowadays invariably contains requests for natural and sometimes even organic perfumes. The reality is, that there is no way that natural perfumes can be sold legally without labeling, or by going against IFRA Standards, and we have to face the fact that we are now firmly in the age of the synthetic perfume. This latter fact is such a truism that many senior perfumers have pointed out that this present generation of emerging perfumers are so unfamiliar with natural ingredients, that they are unable (through lack of training & familiarity) to craft 100% high-art natural perfumes.

The Pressure Builds.

The pressure on perfumers has been building for many years. Time allowed to complete customer briefs in recent years has become drastically reduced, from a once-luxurious 2-3 weeks to a mere few days, largely due to tighter working regimes imposed by powerful supermarket buyers. Progressive health & safety regulation (IFRA, CHIP etc), and the differing regulatory requirements of different nation states have compounded the difficulties. The real pressure however came

with the introduction of the notorious (and some would still argue, largely unnecessary) 26 allergens legislation, initially in the form of the SCCNFP (2002) list, later to become enshrined as the 2003/15/EC Directive.

The perfume market responded by requiring the reformulation of most existing perfumes, and the generation of a new company perfume 'shelf' (i.e. offered range) with either a zero, or a severely reduced, allergens content. This often meant eliminating or severely reducing the natural's content of perfumes (since 16 of these alleged allergens were present in natural products). This move which had disastrous consequences for perfume creation quality - and perfume buyers quickly realized that if they wanted perfumes that didn't actually smell like drain-cleaner from Mars, they needed to allow back a certain number of these allegedly allergenic ingredients.

As a result of this flawed & highly unpopular regulatory approach, annual natural ingredient volumes used in perfumes dropped, the market became destabilized, and many ingredient & fragrance companies foundered with resulting job losses. Lets be quite clear about this: the bitterness against the regulatory authorities generated during this period, as decent honest working people lost their jobs as a result of the effects of this pointless piece of legislation will not be quickly forgotten by many in the trade.

Two years later, came the equally ill-thought out SCCP Opinion on Furanocoumarins (FCF's), SCCP/0942/05. Here a proposal to limit FCF's to 1ppm in the finished cosmetics promoted a quiet (we're not doing that) type of revolution amongst cosmetic companies. Sensible regulatory decisions have to be based on the art of the possible – and perfume construction was approaching near-impossibility with this additional burden. Further it was beginning to dawn on people that the need for more and more precautionary-principle based cosmetic regulations were questionable, when end-user adverse toxicological effects, as reported for finished fragrances purchases, were below the 1 event per million sales mark anyway. Not only this, but why is it that the aroma trade is not entitled to a proper in depth risk/benefit analysis of aroma ingredients, instead of a mere risk analysis? The truth is probably that the skills of REXPAN/RIFM/SCCP etc do not encompass enough cross-disciplines to enable a risk/benefit analysis to be carried out, unlike the situation in all other professions.

To resume the plot (!), just as it seemed things were bad enough, with many other examples of regulatory shambles' from a Brussels cosmetic bureaucracy which is clearly not 'fit for purpose', along comes IFRA's 40 th Amendment. This introduced the QRA approach for perfumery – with no consultation, no dialogue, no assessment of industry's capability of being able to carry it out:: just an order to do it or we will penalize you! This event was the straw that broke the camel's back; red-tape had pretty well strangled the aroma industry already, and yet here was the most involved pieces of technical bureaucracy yet devised – 82

categories of fragrance use under 11 major headings, requiring virtually every ingredient used in a fragrance to have multiple calculations associated with its proposed incorporation in its various applications. In fact, the art of perfumery could now be declared dead at this point, to be replaced by an expensive piece of computer software. If your business cannot afford the necessary programs to cope with this draconian legislation; you are out of the game. Of course the big aroma corporates are busy rubbing their hands with anticipation and glee – only they have the economic resources to cope with this hyperbureaucratic development. And it won't have escaped your notice that toxicologists from the big corporates carried out the toxicological research in the first place, which is said to justify the QRA scheme. However, I repeat, nobody has been allowed to challenge the scientific basis of the work, or its effects on industry – especially with regard to its discriminatory nature towards small companies.

The Dam Bursts.

Cropwatch announced a Boycott of the 40 th IFRA Amendment, putting out its argument out at <http://www.cropwatch.org/newslet3.htm> . IFRA responded with an anonymously written press statement dated 19 th Jan 2007 on its website.

This IFRA press release was curious, in Cropwatch's opinion, since the regulatory authorities, & trade & professional associations had done their level best up to that point, to completely ignore Cropwatch's involved technical arguments (although, ironically, many of the rank and file members of these organizations now anonymously subscribe to Cropwatch). The IFRA press release gave Cropwatch an enormous publicity boost, and Cropwatch increased the pressure by starting a petition against the Amendment which has currently amassed more than 700 signatures. A Cropwatch vs IFRA poll was held by Perfumer & Flavorist on their website which resulted in a landslide for Cropwatch (85.1% of votes in favour). However P & F have subsequently removed the result details from their Newsletter website page, due to pressure from IFRA (see <http://www.perfumerflavorist.com/newsletter/5957641.html>) and they have also been persuaded to publish an astonishing letter on the matter from Jean-Pierre Hourri (president of IFRA).

In this published letter, Hourri fails to do his homework, and makes several ill-advised & inaccurate put-downs. He accuses Cropwatch, amongst other things, of being diametrically opposed to environmental issues (!). In fact Cropwatch (hint: the clue is in the name, Jean-Pierre!!) was set up initially solely to attempt to protect those rare & threatened species being over-exploited by the aroma trade (e.g. see Burfield (2003) & <http://www.cropwatch.org/cropwatch7.htm>), and correspondence on this topic with the EU Cosmetics Sector is on-going.

Hourri also claims that Cropwatch is diametrically opposed to consumer health – in fact my personal record of lecturing on safety matters over several years to industry can speak for itself. Finally Hourri accuses Cropwatch of being a special

interest group, but appears not to know what goes on within his own organization: IFRA have already published an information letter (No 737) on Natural Perfumes and IFRA's Mattias Vey has previously asked Cropwatch for information on maximizing the allowable percentage of certain naturals in finished fragrances. If Further, if IFRA are now not following & supporting the ascendancy of natural ingredients and natural perfumery, then they are in acute danger of becoming irrelevant.

On-line democracy in the aroma business has therefore been demonstrated by the success of P & F poll, the success of the Cropwatch petition and the enormous media interest in the Boycott topic. Cropwatch believes however that the various bodies concerned will do their utmost to ignore these results.

The fundamental point here is that the regulatory process has to be opened up. At present there is no way that any person or end-user group with a viewpoint or technical argument can input into this roller coaster of fee-paying closed interest groups, privileged committees and 'expert' panels in the Brussels closed group. The regulatory process usually starts with deliberations from REXPAN or RIFM, is endorsed by IFRA, goes through SCCP and DG Enterprise, ready for the statute books as an EU Directive or Regulation. If, say, you as an outsider, wanted to challenge the science behind IFRA's 37 th Amendment (and we do!), who is the independent authority which can be trusted do this impartially? Certainly, not the bodies that are already involved, on their past records.

Fragrance Anarchy Needs Preventing.

Cropwatch maintains that there is now a discernable loss of faith in the fragrance regulation process. When the people that work in the industry lose their respect for the system, or feel that it discriminates against their particular interests (as with small & micro-sized industries), or feel that there is an unequal situation between over-regulated fragrances and relatively under-regulated food flavourings, then those grievances need to be looked at. Above all, there is a certain percentage of the population which wants to continue to be able to use ingredients or perfumes containing natural aromatic ingredients, rather than synthetics. As we have indicated earlier, natural perfumes have all but been eliminated in practice by progressive legislation from the IFRA/EU Cosmetics Commission.

Internet trading and a general black-market in natural perfumes, which flouts all safety considerations is becoming a distinct possibility, if it is not here already. This is not what we want. We all need the rule of law, we all want to carry out our duty of due diligence, & we all have a duty of care to one another. But we can only do that through sensible regulation.

And sensible regulation is precisely what we don't have.

About the author

Tony Burfield is the Co-founder of Cropwatch

Note from the Editor: We emailed IFRA on the 21st of February offering them the chance to share their thoughts. As of writing (23rd February) IFRA have not responded. The offer is still open to them. -- UPDATE 26th February - we have heard from IFRA who have said they will look over the points Mr Burfield has raised.

We are seeking the opinions on the 40th Amendment from either side of the argument. If you would like to have your say, email us on grant@basenotes.net

Reference :

Burfield T. (2003) 'Unethical Use of Rare & Threatened Plant & Animal Products in the Aroma Industry.' *Endangered Species Update* May/June 2003, Vol 20 (3), pp 91-106.

Note about acronyms: Anya McCoy from the Artisan Natural Perfumers Guild has kindly emailed us a list of acronym definitions for some of those mentioned in the article.

A simple FAQ about the issue can be found at the [Artisan Natural Perfumers Guild Website](#)

1. Cropwatch
2. IFRA
3. IFRA Code of Practice
4. Artisan Natural Perfumers Guild
5. IFRA News
6. RIFM Research Institute for Fragrance Materials
7. EFFA European Flavour & Fragrance Association
8. REXPAN RIFM's Expert Panel
9. SCCP Scientific Committee on Consumer Products
10. FDA Federal Drug Administration

11. COLIPA The European Cosmetic Toiletry and Perfumery Association
 12. IFSCC The International Federation of Societies of Cosmetic Chemists
 13. EU Directives (Wikipedia)
 14. EU Cosmetics Directive 76/768/EEC
 15. SCCP Opinions
 16. BPD Biocidal Products Directive
 17. Global Harmonization
 18. GHS Global Harmonization System of Labeling & Classification of Chemicals
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from <http://anyasgarden.blogspot.com>

Friday, March 02, 2007

It's the synthetics, stupid. (to paraphrase an American political slogan)

Tony Burfield's recent work challenging IFRA and the EU has forced them to show their hand, and here is the plain, awful truth, which Tony said all along was their agenda:

<http://www.cosmeticsdesign-europe.com/news/printNewsBis.asp?id=74667>

(UPDATE MARCH 7, 2007. IFRA has forced cosmeticsdesign-europe to change the website. Read the additional blog entry at the end of the primer for the rewriting of history)

They're insisting that synths are good, and naturals are not so good, complicated and expensive. Baloney (well, ok, some naturals are expensive, let the market find it's own level.)

Funny they cite Calone: it was the first perfume ingredient that ever caused a respiratory reaction from me. For my entire life, despite dousing myself in perfumes that yes, contained some synths, when Calone was introduced, it, and the other harsh synths that followed, caused both me and a lot of the general public to rebel against heavy, harsh perfumes. I had no idea what, at that time, had changed perfume, I just knew everyone was complaining.

Before that, I remember people would complain someone was wearing "too much" perfume, but after the age of harsh synths came in, governments and workplaces started banning perfumes. It's not the naturals, it's the harsh synths, and yet IFRA is promoting them. Too much oakmoss, used by an imprudent perfumer, can cause a rash and sensitization: too much calone and other synths can cause severe respiratory distress, watering eyes, etc.

Additionally, many synths are just plain flat and boring, linear and stiff. Naturals evolve and waft gently, and bring a sense of the real world, not chemistry lab sterile hallways, to the wearer.

This HAS to be a wake up call for all of us.

I spoke with someone in the Cosmetics industry yesterday who recently attended a workshop on California's Prop 65 that limits perfume ingredients. The packed room of 150 industry insiders had NO idea that IFRA/EU and Global Harmonization are coming our way. They are scared silly and just starting to muster responses to it all. I'll be networking more and more over the next few months to build a coalition to address a fair and sensible way to counteract this bureaucracy that aims to put naturals out of the market.

Warning labels should suffice - in a properly-regulated, non-Big-Brother world they would, as they currently do here in the states. Think you may be allergic to perfume? Don't use it. Don't let bullies take your favorite perfumes away from you, or cripple the future of creative artists who wish to blend the beautiful naturals.

Ban the stuff that makes eyes water in elevators, or severely limit their percentages in perfume. It's all such Machiavellian nonsense to go after naturals.

Just when naturals are gaining in popularity, the very growers and distillers, suppliers and manufacturers of these materials can be shut down or have their business severely curtailed. Very sobering, scary stuff.



Clear real-world examples of regulation out of control:

A natural perfumery yahoo group member posted how confused she was about all this, the banned or restricted, what is what, and who is doing this? Another member, who is keeping up with all the IFRA and EU workings, replied with some succinct observations:

OK Ruth, here is something you can get your teeth into. IFRA have completely banned melissa oil. They have done this - their words not mine - because none of their members were interested in funding human skin sensitization tests, and initial testing had indicated some allergy in guinea pigs.

The important point here is that this decision was essentially political - it certainly was not based on science. IFRA members, who include companies such as Procter and Gamble, Unilever, and Quest International essentially, decide IFRA policy.

The IFRA director general, by the way, is now Jean-Pierre Houri, who until recently was CEO of Quest International, a synthetic fragrance innovator. Quest is owned by ICI (Imperial Chemical Industries - Britain's biggest paint manufacturer).

The SCCP seem to have recently decided to adopt IFRA guidelines and translate these into EU directives. Whether this takes one year or ten in some ways is beside the point. If we let IFRA get away with something we can pretty much assume it will be adopted by the SCCP, whose policies are, if anything, more stringent than those of IFRA.

For example, the SCCP have decided - again, not based on human real-world evidence - that furocoumarins must be limited in cosmetics to one part per million. This effectively bans the use of citrus oils - not as such, but through a constituent type. OK, it's not an outright ban, but furocoumarins occur at up to 3% in some citrus oils, and 1 ppm is 0.0001%. As another perfumer said, you'll get thousands of times that amount on your skin when you peel an orange. It's all rather insane.

Source: <http://cropwatch.org/stephen.htm> An article by John Stephen, natural perfumer

"...if you go down to your local supermarket and buy an orange, even though your hands will be dripping in many thousand times as much limonene when you peel it, you don't have to be warned about that apparently."

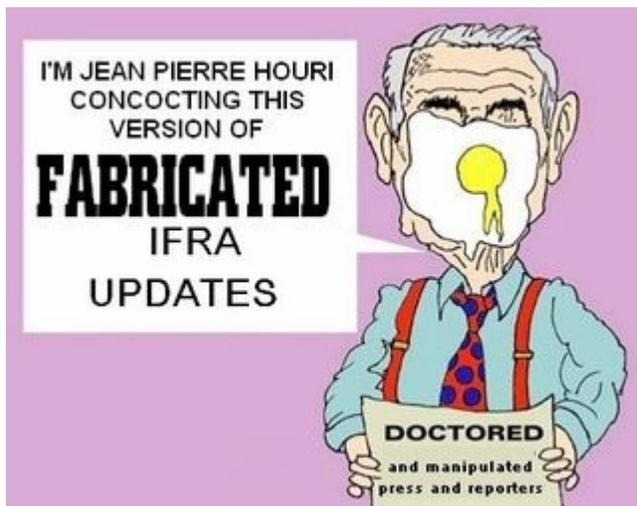


Stay tuned as the natural aromatics community networks worldwide with the natural products industry to address these issues.

I'm wondering if I should take credit for this development, described below. A few days after my "It's the Synthetics, stupid" blog, this occurred:

<http://anyasgarden.blogspot.com/2007/03/scandalous-what-are-ifra-spin-doctors.html>

Scandalous! What are the IFRA spin doctors thinking? That they wouldn't get caught?



I visited Robin's blog [Now Smell This](#) today, as I do every day, and sharp-eyed Robin caught IFRA, the International Fragrance Association - now this is my word, not Robin's - forcing - Cosmetics Design-Europe online magazine into rewriting history. I saved the original post on March 2nd to my harddrive, and I will take time to go over the complete article. The most glaring, unbelievable, outrageous, manipulative (grab a Thesaurus and fill in some more) jerking around of the Fourth Estate has taken place:

In "IFRA Promotes Synthetic Ingredients in Fragrance", an article which first appeared on 3/2 in Cosmetics Design-Europe, and the subject of my blog "It's the Synthetics, Stupid" March 2nd, (just scroll down) that may, IMHO, have caused the journalistic malfeasance, here's what first appeared:

IFRA has suggested that the many benefits of using synthetic ingredients within fragrance production outweighs the use of natural ingredients – coinciding with the controversial revision of its code of practice last year.

Google's cache has this original opening paragraph, but not the complete article. Here it is for your mouth-hanging-open in shock perusal, reworded by perhaps IFRA Director General Jean Pierre Houri himself? A general is responsible for all actions taken by his troops, correct?

IFRA has suggested that the many benefits of using synthetic ingredients within fragrance production are equally as important as that of natural ingredients - coinciding with the controversial revision of its code of practice last year.

Ah, so nice, so friendly, so much an example of backpedaling furiously it is laughable.

Here's the original second paragraph:

The association has used its annual 2007 winter update to encourage the use of synthetic materials, suggesting that the ingredients are more stable and less susceptible to price fluctuations within the market.

But if you visit the sneakily-changed new version:

The association has used its annual 2007 winter update to encourage the use of both synthetic and natural materials, suggesting that synthetic ingredients are stable and less susceptible to price fluctuations within the market.

First, IFRA had Cropwatch's landslide win in a poll on Perfumer and Flavorist magazine reopened, when, like petulant schoolboys on a soccer field, they didn't like the score, then, made P&F take it down two days later. [Click here to read about it.](#)

I have to give them credit -- their shenanigans are historic, like the bumbling burglars at Watergate. Like Nero fiddling while Rome burned. Like singing while the Titanic went down. If that's the kind of credit and credibility they want, that's what they're getting, yesss sir, that's what they're getting.

And I predict, given the ground swell of support that is happening worldwide in the support of naturals since this all broke, they will suffer the same fate. Wonder if Jean Pierre Houri, the current head of IFRA, ever thought his heavy handed corporate tactics used when he was at the helm of Quest, a huge synthetics-manufacturing company, would help bungle IFRA's image so, now that they are recognized as a media-manipulating bully that changes its own words to suit a constituency that now knows IFRA does not support their interests? PS. Quest is owned by Imperial Chemical Industries, so it doesn't take a large leap of logic to see where Houri's **interests lie.**