

ALLERGEN DECLARATION CERTIFICATE

In accordance with Regulation (EC) No. 1223/2009 (as amended) – Annex III (EU Cosmetic Regulation)

Oakwood Absolute 50% TEC

PRODUCT IDENTIFICATION

Parameter	Details
Product Name	Oakwood Absolute 50% TEC
Alternative Name	Oak Wood Absolute 50% in Triethyl Citrate
Botanical Source	<i>Quercus</i> spp.
Botanical Family	Fagaceae
INCI Description	Quercus Wood Extract, Triethyl Citrate
Oakwood Extract CAS Number	Supplier-specific; not assigned in this declaration
Triethyl Citrate CAS Number	77-93-0
Triethyl Citrate EC Number	201-070-7
Composition	Approximately 50% Oakwood Absolute and 50% Triethyl Citrate
Material Type	Natural Complex Substance in perfumery diluent

REGULATORY BASIS

This declaration has been prepared with reference to:

- Regulation (EC) No. 1223/2009 on cosmetic products
- Annex III concerning restricted substances and fragrance-allergen labelling
- Commission Regulation (EU) 2023/1545
- Applicable transitional and finished-product labelling requirements

Commission Regulation (EU) 2023/1545 amended the Cosmetics Regulation by expanding the substances subject to individual fragrance-allergen labelling.

EU LABELLING THRESHOLDS

An individually regulated fragrance allergen must generally be declared in the ingredient list when its concentration exceeds:

Finished Cosmetic Type	Declaration Threshold
Leave-on cosmetic products	0.001%
Rinse-off cosmetic products	0.01%

These thresholds apply to each listed fragrance allergen in the finished cosmetic product, not to the raw material as a whole.

OAKWOOD EXTRACT STATUS

Quercus Wood Extract or Oakwood Absolute was not identified as a botanical extract that must automatically be declared by its own name solely under the fragrance-allergen provisions reviewed for this statement.

However, any individually listed fragrance allergens naturally present in the extract must be declared when their finished-product concentrations exceed the applicable thresholds.

Assessment	Status
Oakwood Absolute automatically declarable by its commercial name	Not identified
Triethyl Citrate individually listed as a fragrance allergen	No
Naturally occurring listed allergens possible	Yes
Batch-specific allergen analysis required	Yes
Finished-product calculation required	Yes

REPRESENTATIVE ALLERGEN PROFILE

The following table is qualitative and representative. The actual composition depends on oak species, geographical origin, wood treatment, extraction and batch.

EU Fragrance Allergen CAS Number		Representative Status in Supplied Product
Coumarin	91-64-5	May be naturally present
Eugenol	97-53-0	May be naturally present
Isoeugenol	97-54-1	May be naturally present
Limonene	138-86-3 / 5989-27-5	Batch dependent
Linalool	78-70-6	Batch dependent
Benzyl Alcohol	100-51-6	May be naturally present
Benzyl Benzoate	120-51-4	Batch dependent
Benzyl Salicylate	118-58-1	Not expected unless naturally present or introduced
Citral	5392-40-5	Not expected or trace; batch dependent
Geraniol	106-24-1	Not expected or trace; batch dependent
Farnesol	4602-84-0	Not expected or trace; batch dependent
Triethyl Citrate	77-93-0	Approximately 50%; not individually listed as a fragrance allergen

“May be present,” “not expected,” and “batch dependent” are qualitative statements and do not constitute analytical results.

QUANTITATIVE DECLARATION

Assessment	Status
Oakwood Absolute Content	Approximately 50%
Triethyl Citrate Content	Approximately 50%
Batch-Specific GC/MS Report Supplied	No
Quantitative EU Allergen Report Supplied	No
Allergens Intentionally Added Separately	None declared
Exact Allergen Concentrations	Not established
Suitable for Final Label Calculation Without Testing	No

ALLERGEN CONTRIBUTION CALCULATION

Where a batch analysis identifies an allergen concentration in the supplied 50% dilution:

Allergen in finished product (%) =

Allergen in supplied material (%) × supplied-material dosage (%) ÷ 100

Example

Where the supplied material contains 0.20% Coumarin and is used at 1.00% in a finished product:

$0.20 \times 1.00 \div 100 = 0.002\%$ Coumarin

The resulting concentration would exceed the 0.001% leave-on threshold, but would remain below the 0.01% rinse-off threshold.

This is an illustrative calculation only and does not represent an actual Oakwood Absolute batch result.

DILUTION CONSIDERATION

Because the product contains approximately 50% Oakwood Absolute, constituents occurring only in the oakwood portion are theoretically reduced by approximately half compared with the corresponding undiluted extract.

However, dilution does not remove the requirement to:

- Identify applicable allergens.
 - Calculate their final concentrations.
 - Include contributions from every other fragrance raw material.
 - Declare each allergen above the applicable threshold.
 - Conduct a finished-product cosmetic safety assessment.
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EU 2023/1545 CONSIDERATIONS

Regulation (EU) 2023/1545 added further fragrance allergens to Annex III and retained the existing individually labelled allergens. The finished-product manufacturer must assess both the established allergens and the expanded substances applicable under the regulation.

A complete updated allergen assessment therefore requires a batch-specific report covering the applicable Annex III fragrance allergens, rather than only the historical allergen list.

RESPONSIBILITY OF THE FINISHED-PRODUCT MANUFACTURER

The manufacturer or EU Responsible Person must:

1. Obtain a quantitative batch-specific allergen declaration.

2. Confirm the precise concentration of Oakwood Absolute in the supplied product.
 3. Calculate allergens contributed by this material.
 4. Add contributions from all other fragrance ingredients.
 5. Declare each allergen above 0.001% in leave-on products.
 6. Declare each allergen above 0.01% in rinse-off products.
 7. Prepare or update the Cosmetic Product Safety Report.
 8. Maintain supporting documentation in the Product Information File.
 9. Confirm compliance with Regulation (EU) 2023/1545 and any applicable corrigenda or amendments.
 10. Confirm compliance in each destination market.
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DECLARATION

Based on the information available, Aromology Trading LLC declares that:

- Oakwood Absolute 50% TEC contains approximately 50% natural Oakwood Absolute and 50% Triethyl Citrate.
 - Triethyl Citrate is not individually identified as an EU fragrance allergen.
 - Oakwood Absolute is a Natural Complex Substance with batch-variable composition.
 - No separate EU fragrance allergens are intentionally added, based on the stated formulation.
 - Naturally occurring fragrance allergens may be present in the oakwood portion.
 - No quantitative GC/MS or manufacturer allergen analysis was supplied.
 - Exact allergen concentrations cannot therefore be certified.
 - A batch-specific quantitative declaration is required for finished-product labelling and regulatory assessment.
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DISCLAIMER

This declaration is based on representative botanical information and the stated 50% TEC formulation. It is not a substitute for:

- Original manufacturer analytical data
- Batch-specific GC/MS analysis
- A quantitative EU allergen certificate
- A Cosmetic Product Safety Report
- Finished-product labelling calculations

No guarantee of absence, concentration or regulatory suitability is made for any constituent without analytical confirmation.
