



EU ALLERGEN DECLARATION CERTIFICATE

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

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Schiff Hydroxycitronellal

Product Identification

Item	Details
Product Name	Schiff Hydroxycitronellal
Manufacturer	Synarome
Product Reference	085170
CAS Number	89-43-0
EC Number	201-908-1
Product Type	Schiff Base Aroma Chemical

EU Allergen Status

The finished Schiff-base molecule CAS 89-43-0 is chemically distinct from free Hydroxycitronellal.

However, Hydroxycitronellal itself is an individually declarable EU fragrance allergen under Annex III of the Cosmetics Regulation. The expanded EU fragrance-allergen regime is governed by Regulation (EU) 2023/1545.

Commercial Schiff-base material can also contain:

- Residual Hydroxycitronellal
- Residual Methyl Anthranilate
- Hydrolysis-derived Hydroxycitronellal
- Manufacturing impurities



Therefore, no blanket “allergen free” statement should be issued without the current Synarome quantitative allergen declaration.

Hydroxycitronellal

Substance	CAS Number	EU Status
Hydroxycitronellal	107-75-5	EU declarable fragrance allergen
Schiff Hydroxycitronellal	89-43-0	Schiff-base reaction product

The IFRA 56.4% conversion factor is an IFRA exposure calculation and must not automatically be entered as “56.4% Hydroxycitronellal” on an EU allergen declaration.

The actual free/declarable Hydroxycitronellal content should come from the manufacturer’s composition or analytical declaration.

Representative EU Allergen Assessment

EU Fragrance Allergen	Status
Hydroxycitronellal	Potentially relevant – quantitative Synarome declaration required
Alpha-Isomethyl Ionone	Not expected
Amyl Cinnamal	Not expected
Amyl Salicylate	Not expected
Amylcinnamyl Alcohol	Not expected
Anethole	Not expected
Anise Alcohol	Not expected
Benzaldehyde	Not expected
Benzyl Alcohol	Not expected
Benzyl Benzoate	Not expected
Benzyl Cinnamate	Not expected
Benzyl Salicylate	Not expected
Camphor	Not expected
Cinnamal	Not expected
Cinnamyl Alcohol	Not expected
Citral	Not expected
Citronellol	Not expected
Coumarin	Not expected
Eugenol	Not expected



Farnesol	Not expected
Geraniol	Not expected
Hexyl Cinnamal	Not expected
Isoeugenol	Not expected
Limonene	Not expected
Linalool	Not expected
Methyl 2-Octynoate	Not expected
<i>Evernia prunastri</i> Extract	Not expected
<i>Evernia furfuracea</i> Extract	Not expected

“Not expected” is not analytical confirmation of zero concentration.

Methyl Anthranilate

Methyl Anthranilate is the amine component used to form the Schiff base and is responsible for the characteristic grape-like aspect of the material.

Residual Methyl Anthranilate may remain depending on manufacturing specification.

Its presence should be assessed separately under the applicable cosmetic-regulatory framework and must not be inferred solely from the trade name.

Finished Cosmetic Declaration Thresholds

An individually declarable fragrance allergen must be listed in the finished cosmetic when present above:

Product Type	Threshold
Leave-on product	0.001%
Rinse-off product	0.01%

Finished Product Calculation

For confirmed free Hydroxycitronellal:

Hydroxycitronellal in raw material
× Schiff Hydroxycitronellal dosage in fragrance
× fragrance dosage in finished cosmetic



Any Hydroxycitronellal from other raw materials must then be added.

Important Difference Between IFRA and EU Labelling

IFRA

Treats CAS 89-43-0 as contributing:

56.4% Hydroxycitronellal equivalent

for safety-restriction calculations.

EU Allergen Declaration

Requires the actual quantity of legally declarable Hydroxycitronellal in the finished cosmetic.

Therefore:

56.4% IFRA equivalent $\neq$ automatically 56.4% EU free allergen content

Declaration

For Schiff Hydroxycitronellal – Synarome:

- Reference: 085170
 - CAS: 89-43-0
 - The product is a Hydroxycitronellal–Methyl Anthranilate Schiff base.
 - Hydroxycitronellal, CAS 107-75-5, is an EU declarable fragrance allergen.
 - Free/residual Hydroxycitronellal must be quantified from the current Synarome allergen declaration.
 - No blanket “allergen free” claim is made.
 - The IFRA 56.4% conversion factor is not automatically an EU allergen percentage.
 - Final cosmetic labelling must be calculated using the complete formula and cumulative allergen contribution.
 - The current Synarome quantitative allergen declaration should take precedence for formal regulatory/customer submissions.
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Authorised by:

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Director