



EU ALLERGEN DECLARATION CERTIFICATE

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

Aromology Trading LLC
G05 Al Ghazal Building
Nadd Al Hamar
Dubai, United Arab Emirates

Website: www.aromology.com
Email: info@aromology.com

Aquaflora TOCO™

Product Identification

Parameter	Details
Product Name	Aquaflora TOCO™
Manufacturer	International Flavors & Fragrances Inc. – IFF
IFF IPC Number	134635
IFF Product Code	00134635
Chemical Name	4,7-Methano-1H-indene-5-acetaldehyde, octahydro-
CAS Numbers	1339119-15-1 / 1338815-87-4
Product Type	Stabilised fragrance ingredient
Regulatory Basis	Regulation (EC) No. 1223/2009
Expanded Allergen Regulation	Regulation (EU) 2023/1545

Finished-Product Declaration Thresholds

Fragrance allergens listed in Annex III must be declared individually in the finished cosmetic when their cumulative concentration exceeds:

Product Type	Declaration Threshold
Leave-on cosmetic product	0.001% / 10 mg/kg
Rinse-off cosmetic product	0.010% / 100 mg/kg

These thresholds apply to the finished cosmetic, not directly to the raw fragrance material.

Principal Chemical Assessment

The principal Aquaflora chemical:

4,7-Methano-1H-indene-5-acetaldehyde, octahydro-

is not identified in this document as an individually named traditional EU Annex III fragrance allergen.

However, the commercial TOCO grade also contains antioxidants and may contain trace manufacturing constituents.

A current quantitative IFF allergen declaration is therefore required before issuing a final “none detected,” “zero” or “allergen-free” statement.

Traditional EU Fragrance-Allergen Review

Fragrance Allergen	CAS Number	Representative Status
Alpha-Isomethyl Ionone	127-51-5	Not expected from stated principal composition; verify with IFF
Amyl Cinnamal	122-40-7	Not expected from stated principal composition; verify with IFF
Amylcinnamyl Alcohol	101-85-9	Not expected from stated principal composition; verify with IFF
Anise Alcohol	105-13-5	Not expected from stated principal composition; verify with IFF
Benzyl Alcohol	100-51-6	Not expected from stated principal composition; verify with IFF
Benzyl Benzoate	120-51-4	Not expected from stated principal composition; verify with IFF
Benzyl Cinnamate	103-41-3	Not expected from stated principal composition; verify with IFF
Benzyl Salicylate	118-58-1	Not expected from stated principal composition; verify with IFF
Cinnamal	104-55-2	Not expected from stated principal composition; verify with IFF
Cinnamyl Alcohol	104-54-1	Not expected from stated principal composition; verify with IFF
Citral	5392-40-5	Not expected from stated principal composition; verify with IFF
Citronellol	106-22-9	Not expected from stated principal composition; verify with IFF
Coumarin	91-64-5	Not expected from stated principal composition; verify with IFF
Eugenol	97-53-0	Not expected from stated principal composition; verify with IFF
Farnesol	4602-84-0	Not expected from stated principal composition; verify with IFF
Geraniol	106-24-1	Not expected from stated principal composition; verify with IFF
Hexyl Cinnamal	101-86-0	Not expected from stated principal composition; verify

		with IFF
Hydroxycitronellal	107-75-5	Not expected from stated principal composition; verify with IFF
Isoeugenol	97-54-1	Not expected from stated principal composition; verify with IFF
Limonene	5989-27-5	Not expected from stated principal composition; verify with IFF
Linalool	78-70-6	Not expected from stated principal composition; verify with IFF
Methyl 2-Octynoate	111-12-6	Not expected from stated principal composition; verify with IFF
Evernia Prunastri Extract	90028-68-5	Not expected from stated principal composition; verify with IFF
Evernia Furfuracea Extract	90028-67-4	Not expected from stated principal composition; verify with IFF

“Not expected” is based on the known principal chemical identity and is not evidence of analytical absence.

TOCO Stabiliser Assessment

The commercial grade typically contains:

Stabiliser	Typical Concentration	EU Allergen Consideration
Tocopherol	Approximately 0.05%	Not generally an individually named fragrance allergen
Stabiliff antioxidant	Approximately 0.05%	Exact chemical identity must be obtained from IFF

The trade name **Stabiliff** is insufficient for a final EU allergen assessment.

Before formal issue, obtain:

- Chemical identity
- CAS number
- Exact concentration
- Annex III status
- Quantitative allergen contribution
- Current IFF composition statement

Expanded EU 2023/1545 Assessment

The current IFF allergen declaration must be reviewed for all additional substances introduced under Regulation (EU) 2023/1545.

The review must include any relevant:

- Terpene derivatives
- Aromatic alcohols
- Aldehydes
- Esters
- Oxidation products
- Stabiliser components
- Trace manufacturing impurities
- Grouped natural complex substances

No expanded-allergen-free claim is supported by this template.

Skin Sensitisation Versus EU Allergen Labelling

Aquaflora TOCO is classified as a skin sensitiser under the available SDS.

This does not automatically mean the principal material must be individually declared as an EU Annex III fragrance allergen.

These are separate assessments:

1. CLP/GHS hazard classification
2. IFRA conformity
3. EU Annex III allergen labelling
4. Finished cosmetic safety assessment

A fragrance material may be sensitising without being one of the individually named cosmetic allergens.

Cumulative Formula Assessment

The finished-product manufacturer must combine allergen contributions from:

- Aquaflora TOCO
- Other aroma chemicals
- Essential oils
- Absolutes
- Botanical extracts
- Fragrance bases
- Preservatives
- Tocopherol
- Stabiliff
- Solvents
- Functional ingredients
- All other raw materials

The same allergen must be added cumulatively from every source.

Representative Declaration Summary

Requirement	Status
Principal Aquaflora substance identified as a traditional EU fragrance allergen	No, based on stated identity
Tocopherol identified as an individually named fragrance allergen	No
Stabiliff composition fully identified	No
Traditional allergen absence confirmed by current IFF declaration	Not verified
Expanded EU 2023/1545 status confirmed	Not verified
Current quantitative IFF declaration required	Yes
Finished-product calculation required	Yes
Cumulative formula calculation required	Yes
Allergen-free claim supported	No
Final labelling decision	Cosmetic manufacturer / EU Responsible Person

Conditional Declaration

Based on the known principal chemical identity:

Aquaflora itself is not expected to require individual declaration under its chemical name as a traditional EU fragrance allergen.

However, no final zero-allergen or allergen-free declaration can be issued without the current quantitative IFF allergen statement covering:

- Exact commercial TOCO grade
 - Tocopherol
 - Stabiliff
 - Trace constituents
 - Manufacturing impurities
 - Regulation (EU) 2023/1545
-

Disclaimer

This EU Fragrance Allergen Declaration is a representative supplier-style template. It is not the original IFF quantitative allergen declaration.

Before formal issue, verify against:



- Current IFF quantitative allergen declaration
- Current product composition
- Exact identity of Stabiliff
- Original batch Certificate of Analysis
- Current Safety Data Sheet
- Regulation (EC) No. 1223/2009
- Regulation (EU) 2023/1545
- Current consolidated Annex III
- Complete finished-product formula

The cosmetic manufacturer or EU Responsible Person remains responsible for cumulative allergen calculations, ingredient-list labelling and finished-product compliance.

Authorised by:

Fozia Khot
Director