



EU ALLERGEN DECLARATION CERTIFICATE

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

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Bornafix® – IFF

Product Identification

Parameter	Details
Product Name	Bornafix®
Manufacturer	International Flavors & Fragrances Inc. – IFF
IFF IPC Number	21067
Chemical Name	2-Methyl-3-({1,7,7-trimethylbicyclo[2.2.1]heptan-2-yl}oxy)propan-1-ol
CAS Number	128119-70-0
Molecular Formula	C ₁₄ H ₂₆ O ₂
Product Type	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 individually declared 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 completed cosmetic product and must be calculated cumulatively from every raw-material source.

Principal Chemical Assessment

The principal Bornafix® chemical:

2-Methyl-3-({1,7,7-trimethylbicyclo[2.2.1]heptan-2-yl}oxy)propan-1-ol

is not identified as one of the traditionally named EU fragrance allergens.

Based on the stated principal identity:

Bornafix® itself is not expected to require individual declaration as a traditional Annex III fragrance allergen.

A current IFF quantitative allergen declaration must nevertheless be obtained to confirm the status of minor constituents, stabilisers and manufacturing impurities.

Traditional EU Fragrance-Allergen Declaration

Fragrance Allergen	CAS Number	Representative Content
Alpha-Isomethyl Ionone	127-51-5	Not expected / below declaration level*
Amyl Cinnamal	122-40-7	Not expected / below declaration level*
Amylcinnamyl Alcohol	101-85-9	Not expected / below declaration level*
Anise Alcohol	105-13-5	Not expected / below declaration level*
Benzyl Alcohol	100-51-6	Not expected / below declaration level*
Benzyl Benzoate	120-51-4	Not expected / below declaration level*
Benzyl Cinnamate	103-41-3	Not expected / below declaration level*
Benzyl Salicylate	118-58-1	Not expected / below declaration level*
Cinnamal	104-55-2	Not expected / below declaration level*
Cinnamyl Alcohol	104-54-1	Not expected / below declaration level*
Citral	5392-40-5	Not expected / below declaration level*
Citronellol	106-22-9	Not expected / below declaration level*
Coumarin	91-64-5	Not expected / below declaration level*
Eugenol	97-53-0	Not expected / below declaration level*
Farnesol	4602-84-0	Not expected / below declaration level*
Geraniol	106-24-1	Not expected / below declaration level*
Hexyl Cinnamal	101-86-0	Not expected / below declaration level*
Hydroxycitronellal	107-75-5	Not expected / below declaration level*
Isoeugenol	97-54-1	Not expected / below declaration level*
Limonene	5989-27-5	Not expected / below declaration level*
Linalool	78-70-6	Not expected / below declaration level*
Methyl 2-Octynoate	111-12-6	Not expected / below declaration level*
Evernia Prunastri Extract	90028-68-5	Not expected / below declaration level*
Evernia Furfuracea Extract	90028-67-4	Not expected / below declaration level*

*Based on the stated principal chemical identity only. This is not a quantitative analytical confirmation.

Expanded Regulation (EU) 2023/1545 Assessment

The expanded EU allergen requirements introduce additional individually declarable fragrance substances and grouped materials.

A current manufacturer declaration must be reviewed for any relevant:

- Terpene alcohols
- Terpene ketones
- Aromatic alcohols
- Aldehydes
- Esters
- Oxidation products
- Stabiliser components
- Trace manufacturing impurities
- Natural complex substances

No definitive expanded-allergen-free statement is supported without current IFF quantitative documentation.

Camphor-Derived Identity Consideration

Bornafix® has a bicyclic chemical structure associated with a camphor-derived or bornane-type framework.

This structural relationship does not mean that the product must automatically be declared as:

- Camphor
- Borneol
- Isoborneol
- Limonene
- Linalool
- Another separately named allergen

EU labelling must follow the actual chemical identity and quantitative composition, not merely structural similarity or raw-material origin.

Skin Sensitisation Versus Annex III Labelling

Hazard classification and cosmetic allergen labelling are separate assessments.

A material may:

- Be classified as a skin sensitiser under CLP or GHS, but
- Not be one of the individually named Annex III fragrance allergens.

Conversely, an Annex III allergen may require finished-product declaration even where the complete raw material is not classified as a skin sensitiser.

The current SDS and quantitative allergen declaration must therefore both be reviewed.

Cumulative Formula Assessment

The finished-product manufacturer must combine allergen contributions from:

- Bornafix®
- Other aroma chemicals
- Essential oils
- Absolutes
- Botanical extracts
- Fragrance bases
- Antioxidants
- Preservatives
- Solvents
- Functional ingredients
- All other raw materials

The same allergen must be added cumulatively from every source.

Representative Declaration Summary

Requirement	Status
Bornafix® principal chemical identified as a traditional EU fragrance allergen	No
Traditional allergens expected from principal identity	None expected
Quantitative absence confirmed by current IFF declaration	Not verified
Expanded EU 2023/1545 status confirmed	Not verified
Current IFF quantitative declaration required	Yes
Finished-product calculation required	Yes
Cumulative formula calculation required	Yes
“Allergen-free” claim supported by this document	No
Final ingredient-list decision	Cosmetic manufacturer / EU Responsible Person

Conditional Declaration

Based on the principal chemical identity:

No individually named traditional EU fragrance allergen is expected to be intentionally present as the principal component of Bornafix®.

A final declaration of “none,” “zero” or “allergen-free” must not be issued without a current IFF quantitative allergen statement covering:

- Exact commercial product code
- Current composition
- Minor constituents
- Stabiliser system
- Manufacturing impurities
- Regulation (EU) 2023/1545

Disclaimer

This EU Fragrance Allergen Declaration is a representative supplier-style document. It is not the original IFF quantitative allergen declaration and is not evidence of batch-specific analytical testing.

Before formal issue, verify against:

- Current IFF quantitative allergen declaration
- Current product composition
- 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, cosmetic ingredient-list labelling and finished-product compliance.

Authorised by:

Fozia Khot
Director