



EU ALLERGEN DECLARATION CERTIFICATE

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

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Cedryl Acetate

Product Identification

Parameter	Details
Product Name	Cedryl Acetate
Manufacturer	International Flavors & Fragrances Inc. – IFF
IFF IPC Number	00C00180
Representative IFF Product Code	00033077
INCI Name	CEDRYL ACETATE
Chemical Name	(1S,2R,5S,7S,8R)-2,6,6,8-Tetramethyltricyclo[5.3.1.0 ^{1,5}]undec-8-yl acetate
CAS Number	77-54-3
EC Number	201-036-1
Molecular Formula	C ₁₇ H ₂₈ O ₂
Molecular Weight	Approximately 264.40 g/mol
Regulatory Basis	Regulation (EC) No. 1223/2009
Expanded-Allergen Amendment	Regulation (EU) 2023/1545

Regulatory Identity

The cosmetic ingredient database identifies:

Parameter	Details
INCI Name	Cedryl Acetate
CAS Number	77-54-3
EC Number	201-036-1
Cosmetic Function	Perfuming

Cedryl Acetate is chemically distinct from:

Material	CAS Number
Cedryl Acetate	77-54-3
Acetyl Cedrene / Methyl Cedryl Ketone	32388-55-9
Cedryl Methyl Ether / Cedramber	67874-81-1 / 19870-74-7
Cedrol	77-53-2

These names must not be used interchangeably.

EU Annex III Assessment

A review of the official text of Regulation (EU) 2023/1545 identifies:

Acetyl Cedrene – CAS 32388-55-9

as an individually declarable fragrance allergen.

The official regulation does not identify:

Cedryl Acetate – CAS 77-54-3

as a separate individually declarable Annex III fragrance allergen.

Therefore, based on the exact chemical identity:

Cedryl Acetate itself is not identified as an individually declarable EU fragrance allergen under Regulation (EU) 2023/1545.

Important Distinction from Acetyl Cedrene

Cedryl Acetate and Acetyl Cedrene are different substances.

Property	Cedryl Acetate	Acetyl Cedrene
CAS Number	77-54-3	32388-55-9
Chemical Type	Cedrol acetate ester	Cedrane ketone
Typical Trade Description	Cedryl Acetate	Vertofix Coeur / Methyl Cedryl Ketone
EU 2023/1545 Individually Declarable	Not identified	Yes
Allergen Label Name	Not applicable as a listed Annex III allergen	ACETYL CEDRENE

Cedryl Acetate must not automatically be declared as Acetyl Cedrene merely because both are cedar-derived fragrance materials.

Finished-Product Labelling Thresholds

For substances that are listed in Annex III, individual declaration is normally required when the finished cosmetic concentration exceeds:

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

These thresholds do not create a labelling obligation for Cedryl Acetate itself unless it becomes listed or the commercial grade contains another listed allergen.

Representative Quantitative Declaration

Based on the known principal chemical identity:

EU Fragrance Allergen	Representative Status
Cedryl Acetate, CAS 77-54-3	Not an individually listed Annex III allergen
Acetyl Cedrene, CAS 32388-55-9	Not expected as the principal substance; quantitative IFF confirmation required
Traditional EU fragrance allergens	Not intentionally expected from the stated principal identity
Other expanded EU fragrance allergens	Current IFF quantitative declaration required

No definitive numerical zero should be issued without batch-specific manufacturer documentation.

Traditional EU Fragrance-Allergen Review

Fragrance Allergen	Representative Status
Alpha-Isomethyl Ionone	Not intentionally added*
Amyl Cinnamal	Not intentionally added*
Amylcinnamyl Alcohol	Not intentionally added*
Anise Alcohol	Not intentionally added*
Benzyl Alcohol	Not intentionally added*
Benzyl Benzoate	Not intentionally added*
Benzyl Cinnamate	Not intentionally added*
Benzyl Salicylate	Not intentionally added*
Cinnamal	Not intentionally added*

Cinnamyl Alcohol	Not intentionally added*
Citral	Not intentionally added*
Citronellol	Not intentionally added*
Coumarin	Not intentionally added*
Eugenol	Not intentionally added*
Farnesol	Not intentionally added*
Geraniol	Not intentionally added*
Hexyl Cinnamal	Not intentionally added*
Hydroxycitronellal	Not intentionally added*
Isoeugenol	Not intentionally added*
Limonene	Not intentionally added*
Linalool	Not intentionally added*
Methyl 2-Octynoate	Not intentionally added*
Evernia Prunastri Extract	Not intentionally added*
Evernia Furfuracea Extract	Not intentionally added*

*Based on the stated principal identity only. This is not an analytical certificate of absence.

Expanded EU Allergen Review

The complete commercial IFF grade must be checked for expanded allergens that may arise from:

- Residual cedarwood starting materials
- Cedrene isomers
- Acetyl Cedrene
- Terpene constituents
- Cedrol
- Cedrenyl Acetate
- Oxidation products
- Manufacturing by-products
- Added antioxidants
- Added carriers or solvents

The exact composition may differ between crystalline, liquid and technical grades.

Commercial-Grade Considerations

Cedryl Acetate may be sold as:

- Crystalline Cedryl Acetate
- Liquid Cedryl Acetate
- Cedryl Acetate containing related cedar-derived acetates
- A diluted grade

- A technical mixture derived from cedarwood fractions

A liquid grade may contain related substances that are not present at the same level in a purified crystalline grade.

The EU allergen declaration must therefore match:

- Exact IFF sales code
- Batch number
- Assay
- Isomer profile
- Carrier system
- Manufacturing specification

Skin Sensitisation Versus Cosmetic Allergen Labelling

Cedryl Acetate may be classified as a skin sensitiser under CLP or GHS.

This does not automatically make it an individually declarable Annex III fragrance allergen.

The following are separate assessments:

1. CLP/GHS hazard classification
2. IFRA conformity
3. EU Annex III ingredient-list declaration
4. Cosmetic Product Safety Report
5. Finished-product consumer-exposure assessment

A substance can carry H317 – May cause an allergic skin reaction without being an individually named Annex III allergen.

Calculation for a Listed Impurity

Where the current IFF declaration identifies an Annex III allergen as an impurity:

Allergen in finished product (%) =

Cedryl Acetate in fragrance (%) × fragrance dosage (%) × allergen in Cedryl Acetate (%) ÷ 10,000

Illustrative Example Only

Assume:

- Cedryl Acetate in fragrance: 5.00%
- Fragrance dosage in finished product: 10.00%

- Listed impurity in Cedryl Acetate: 0.20%

Calculation:

$$5.00 \times 10.00 \times 0.20 \div 10,000 = 0.001\%$$

The impurity would reach the leave-on declaration threshold.

This example does not indicate that IFF Cedryl Acetate contains an allergen at 0.20%.

Cumulative Finished-Product Assessment

The cosmetic manufacturer must combine allergen contributions from:

- Cedryl Acetate
- Other aroma chemicals
- Cedarwood oils and fractions
- Essential oils
- Absolutes
- Botanical extracts
- Fragrance bases
- Preservatives
- Antioxidants
- Solvents
- Functional ingredients

The same listed allergen must be totalled from every source.

Representative Declaration Summary

Requirement	Status
Cedryl Acetate, CAS 77-54-3, individually listed in EU 2023/1545	No
Acetyl Cedrene, CAS 32388-55-9, individually listed	Yes, but it is a different substance
Traditional allergens intentionally expected from principal identity	None
Batch-specific quantitative IFF declaration required	Yes
Commercial-grade composition verification required	Yes
Finished-product cumulative assessment required	Yes
Absolute allergen-free claim supported	No
Final cosmetic label decision	Cosmetic manufacturer / EU Responsible Person

Formal Declaration



Based on the stated principal identity:

Cedryl Acetate – IFF, CAS 77-54-3, is not identified as an individually declarable EU fragrance allergen under Regulation (EU) 2023/1545.

It must not be confused with:

Acetyl Cedrene, CAS 32388-55-9

which is an individually declarable fragrance allergen.

A final quantitative declaration must nevertheless be based on the current original IFF allergen statement for the exact commercial grade and batch.

Disclaimer

This EU Fragrance Allergen Declaration is a representative supplier-style document.

It is not:

- The original IFF quantitative allergen declaration
- A batch-specific laboratory analysis
- An absolute zero-allergen certificate
- A finished-cosmetic ingredient-list approval
- A Cosmetic Product Safety Report

Before formal issue, verify against:

- Current original IFF quantitative allergen declaration
- Exact IFF product code and physical grade
- Original batch Certificate of Analysis
- Current IFF Safety Data Sheet
- Current consolidated Regulation (EC) No. 1223/2009
- Regulation (EU) 2023/1545
- Complete fragrance formula
- Complete finished-product formula

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

Authorised by:

Fozia Khot
Director

