

EU ALLERGEN DECLARATION CERTIFICATE

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

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PRODUCT INFORMATION

Item	Details
Product Name	Fresh Pandan Leaves Absolute
Alternative Name	Fresh Pandan Leaf Absolute 30%
Botanical Name	<i>Pandanus amaryllifolius</i> Roxb.
INCI Name	Pandanus Amaryllifolius Leaf Extract
CAS Number	1175005-60-30
FEMA Number	4963
Country of Origin	Vietnam
Extraction Method	Solvent extraction followed by concentration and dilution
Product Composition	30% pandan leaf absolute in 70% perfumery-grade carrier
Issue Date	17 July 2026

2. DECLARATION

Fresh Pandan Leaves Absolute is a botanical Natural Complex Substance.

No isolated EU fragrance allergen is intentionally added as part of the pandan leaf absolute.

Based on the representative compositional information available, the traditional EU fragrance allergens listed below are not expected at declarable concentrations in the raw material. However, batch-specific GC-MS or allergen analysis must take precedence.

The allergen status of the 70% carrier must be confirmed separately.

3. TRADITIONAL EU FRAGRANCE ALLERGEN PROFILE

Fragrance Allergen	CAS Number	Representative Raw-Material Content	Status
Alpha-Isomethyl Ionone	127-51-5	Not detected	Not expected
Amyl Cinnamal	122-40-7	Not detected	Not expected
Amylcinnamyl Alcohol	101-85-9	Not detected	Not expected
Anisyl Alcohol	105-13-5	Not detected	Not expected
Benzyl Alcohol	100-51-6	Not detected	Not expected
Benzyl Benzoate	120-51-4	Not detected	Not expected
Benzyl Cinnamate	103-41-3	Not detected	Not expected
Benzyl Salicylate	118-58-1	Not detected	Not expected
Cinnamal	104-55-2	Not detected	Not expected
Cinnamyl Alcohol	104-54-1	Not detected	Not expected
Citral	5392-40-5	Not detected	Not expected
Citronellol	106-22-9	Not detected	Not expected
Coumarin	91-64-5	Not detected	Not expected
Eugenol	97-53-0	Not detected	Not expected
Evernia Furfuracea Extract	90028-67-4	Not detected	Not expected
Evernia Prunastri Extract	90028-68-5	Not detected	Not expected
Farnesol	4602-84-0	Not detected	Not expected
Geraniol	106-24-1	Not detected	Not expected
Hexyl Cinnamal	101-86-0	Not detected	Not expected
Hydroxycitronellal	107-75-5	Not detected	Not expected
Isoeugenol	97-54-1	Not detected	Not expected
Limonene	138-86-3	Not detected	Not expected
Linalool	78-70-6	Not detected	Not expected
Methyl 2-Octynoate	111-12-6	Not detected	Not expected
Butylphenyl Methylpropional	80-54-6	Not intentionally added	Prohibited in EU cosmetic products
Hydroxyisohexyl 3-Cyclohexene Carboxaldehyde	31906-04-4	Not intentionally added	Prohibited in EU cosmetic products

Not detected means not identified in the representative information used to prepare this declaration. It does not represent a guaranteed analytical detection limit without batch-specific laboratory testing.

4. EXTENDED EU FRAGRANCE ALLERGEN ASSESSMENT

Commission Regulation (EU) 2023/1545 amended Regulation (EC) No. 1223/2009 by expanding fragrance-allergen labelling requirements.

The following extended-allergen groups must be considered when supported by batch-specific analytical information:

Extended Allergen or Group	Representative Status
Pinene and related terpene groups	Not expected at a declarable concentration
Menthol and related compounds	Not expected
Camphor	Not expected
Vanillin	Not expected
Cananga/Ylang Flower Oil	Not present
Jasmine Oil/Extract	Not present
Rose Flower Oil/Extract	Not present
Citrus peel oils	Not present
Lavender Oil/Extract	Not present
Eucalyptus-derived allergens	Not present
Cinnamon-derived oils	Not present
Lemongrass Oil	Not present
Narcissus extracts	Not present
Sandalwood Oil	Not present
Turpentine-derived substances	Not present
Other expanded fragrance allergens	Batch-specific assessment required

No collective EU allergen label specifically assigned to *Pandanus amaryllifolius* leaf extract has been identified in the reviewed regulation.

5. CARRIER ALLERGEN STATUS

This declaration assumes that the 70% carrier is a neutral perfumery-grade diluent such as TEC or DPG and contains no intentionally added fragrance allergens.

Where the carrier is:

- Ethanol containing a denaturant
- A fragrance base
- A natural oil

- A botanical extract
- A solvent blend
- A proprietary perfumery base

the allergen declaration must be revised to include all substances contributed by that carrier.

6. EU FINISHED-PRODUCT LABELLING THRESHOLDS

Fragrance allergens must generally be declared in the finished cosmetic ingredient list when their concentration exceeds:

Product Type	Threshold in Finished Product
Leave-on cosmetic products	0.001%
Rinse-off cosmetic products	0.01%

These thresholds are reflected in Commission Regulation (EU) 2023/1545.

The finished-product manufacturer must calculate the contribution from:

- Fresh Pandan Leaves Absolute 30%
- Its carrier
- Every other fragrance ingredient
- Essential oils and natural extracts
- Fragrance compounds
- Functional ingredients containing regulated allergens

7. TECHNICAL QUALIFICATION

The characteristic pandan aroma is particularly associated with 2-acetyl-1-pyrroline and related pyrroline derivatives. FEMA identifies pandan leaf extract as containing less than 0.05% pyrroline derivatives in an appropriate solvent.

2-Acetyl-1-pyrroline is not one of the traditional individually declared EU fragrance allergens.

This does not remove the requirement to conduct a complete cosmetic safety assessment.

8. CUSTOMER RESPONSIBILITY

The customer or finished-product manufacturer is responsible for:

1. Confirming the identity and composition of the carrier.
2. Obtaining batch-specific allergen or GC–MS data.
3. Calculating allergen concentrations in the finished cosmetic.
4. Adding contributions from every raw material.
5. Applying the correct leave-on or rinse-off threshold.
6. Preparing the legally compliant ingredient list.
7. Completing the Cosmetic Product Safety Report.
8. Applying the transitional dates and requirements relevant to the placing-on-the-market date.
9. Checking for later amendments or regulatory corrections.

9. CONCLUSION

Based on the representative composition reviewed:

NO TRADITIONAL EU FRAGRANCE ALLERGEN IS EXPECTED AT A
DECLARABLE CONCENTRATION

No fragrance allergen is intentionally added to the pandan leaf absolute.

This conclusion is conditional upon:

- Use of a neutral allergen-free carrier
- Confirmation by batch-specific analytical data
- Inclusion of allergen contributions from all other finished-product ingredients

10. DISCLAIMER

This declaration is based on representative product information and is not a substitute for validated batch-specific analysis.

Natural botanical extracts may vary according to the raw material, extraction method, processing conditions and storage.

The confirmed carrier composition and batch analytical data must take precedence over this generic declaration.

Authorised by:
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Director