



## 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](http://www.aromology.com)  
Email: [info@aromology.com](mailto:info@aromology.com)

### PRODUCT INFORMATION

| Item              | Details                          |
|-------------------|----------------------------------|
| Product Name      | Golden Virginia Tobacco Absolute |
| Botanical Name    | <i>Nicotiana tabacum</i> L.      |
| INCI Name         | Nicotiana Tabacum Leaf Extract   |
| CAS Number        | 84961-66-0                       |
| Country of Origin | United States of America         |
| Plant Part        | Cured leaves                     |
| Extraction Method | Solvent extraction               |
| Material Type     | Natural Complex Substance        |
| Issue Date        | 17 July 2026                     |

### DECLARATION

Golden Virginia Tobacco Absolute is a natural botanical extract.

No isolated fragrance allergen is declared as intentionally added. However, regulated fragrance allergens may occur naturally or as trace process-related constituents.

The exact allergen profile must be established using batch-specific analytical data.

### REPRESENTATIVE ALLERGEN PROFILE

| EU Fragrance Allergen | CAS Number | Representative Status    |
|-----------------------|------------|--------------------------|
| Benzyl Alcohol        | 100-51-6   | Trace or batch dependent |
| Benzyl Benzoate       | 120-51-4   | Trace or batch dependent |
| Benzyl Salicylate     | 118-58-1   | Not expected or trace    |
| Linalool              | 78-70-6    | Trace or batch dependent |

|                        |           |                          |
|------------------------|-----------|--------------------------|
| Limonene               | 138-86-3  | Trace or batch dependent |
| Geraniol               | 106-24-1  | Trace or not detected    |
| Citral                 | 5392-40-5 | Trace or not detected    |
| Eugenol                | 97-53-0   | Trace or batch dependent |
| Isoeugenol             | 97-54-1   | Trace or not detected    |
| Farnesol               | 4602-84-0 | Trace or not detected    |
| Coumarin               | 91-64-5   | Trace or batch dependent |
| Cinnamal               | 104-55-2  | Not expected             |
| Cinnamyl Alcohol       | 104-54-1  | Not expected             |
| Citronellol            | 106-22-9  | Not expected or trace    |
| Alpha-Isomethyl Ionone | 127-51-5  | Not intentionally added  |
| Hexyl Cinnamal         | 101-86-0  | Not intentionally added  |
| Hydroxycitronellal     | 107-75-5  | Not intentionally added  |

## EU REGULATORY BASIS

Commission Regulation (EU) 2023/1545 amended the EU Cosmetics Regulation regarding the labelling of fragrance allergens and expanded the substances subject to individual declaration. The regulation remains in force and was subject to a corrigendum published in November 2025.

## FINISHED-PRODUCT DECLARATION THRESHOLDS

A regulated fragrance allergen must be individually declared in the finished cosmetic product when its concentration exceeds:

| Finished Product Type | Declaration Threshold |
|-----------------------|-----------------------|
| Leave-on products     | 0.001%                |
| Rinse-off products    | 0.01%                 |

## ILLUSTRATIVE CALCULATION

Where a batch contains 0.20% benzyl alcohol and the absolute is used at 1.0% in a finished leave-on product:

$$0.20\% \times 1.0\% = 0.002\% \text{ benzyl alcohol in the finished product}$$

This exceeds the leave-on declaration threshold of 0.001%.

The calculation is illustrative only. Actual batch values must be used.

## NICOTINE STATEMENT



Nicotine is not a fragrance allergen under the EU fragrance-allergen labelling framework.

Its presence may nevertheless create separate toxicological, classification and regulatory obligations.

This declaration does not certify the product as nicotine-free.

### **RESIDUAL-SOLVENT STATEMENT**

Residual extraction solvents are not automatically fragrance allergens, but they must comply with:

- Cosmetic safety requirements.
- Applicable residual-solvent limits.
- Supplier specifications.
- Finished-product safety assessment requirements.

### **CONCLUSION**

**NO EU-LISTED FRAGRANCE ALLERGEN IS DECLARED AS INTENTIONALLY ADDED**

Trace or naturally occurring allergens may nevertheless be present.

The finished-product manufacturer must:

- Obtain batch-specific allergen information.
- Calculate each allergen contribution.
- Include contributions from all formulation ingredients.
- Declare allergens above the applicable thresholds.
- Separately assess nicotine and residual solvents.

Batch-specific GC-MS, allergen and nicotine analysis must take precedence over this representative declaration.

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**Authorised by:**  
Fozia Khot  
Director