



EU ALLERGEN DECLARATION CERTIFICATE

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

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Product Identification

Parameter	Details
Product Name	Oakmoss Absolute Low Atranol 50% TEC
Botanical Source	<i>Evernia prunastri</i> (L.) Ach.
INCI Description	Evernia Prunastri Extract, Triethyl Citrate
Oakmoss CAS Number	90028-68-5
Oakmoss EC Number	289-861-3
Triethyl Citrate CAS Number	77-93-0
Composition	50% Low-Atranol Oakmoss Absolute in 50% TEC
Material Type	Natural Complex Substance in perfumery diluent

REGULATORY BASIS

This declaration has been prepared with reference to:

- Regulation (EC) No. 1223/2009 on cosmetic products
 - Annex II concerning prohibited substances
 - Annex III concerning restricted substances and fragrance-allergen labelling
 - Commission Regulation (EU) 2023/1545 concerning fragrance-allergen labelling
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DECLARATION OF OAKMOSS EXTRACT

Evernia Prunastri Extract is itself an individually declarable EU fragrance allergen.

Its presence must be indicated in the finished cosmetic product ingredient list when its concentration exceeds:

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

These thresholds are specified for Evernia Prunastri Extract in Annex III.

Because this product contains 50% Evernia Prunastri Extract, the supplied dilution reaches those thresholds when used above:

Finished Cosmetic Type	Maximum Dilution Level Before Oakmoss Declaration Threshold Is Exceeded
Leave-on products	0.002%
Rinse-off products	0.020%

Therefore, when the supplied material is used above these concentrations, the finished-product ingredient list must include:

Evernia Prunastri Extract

Triethyl Citrate is not covered by the fragrance-allergen declaration requirement solely by virtue of being present as the diluent.

ATRANOL AND CHLOROATRANOL

Atranol and chloroatranol are natural constituents historically associated with oakmoss and treemoss extracts. EU legislation placed both substances in Annex II because of their strong sensitising potential.

Substance	CAS Number	Representative Product Specification	EU Consideration
Atranol	526-37-4	Below 50 ppm in the 50% dilution	Prohibited substance; only technically unavoidable traces may be assessed under Article 17
Chloroatranol	57074-21-2	Below 50 ppm in the 50% dilution	Prohibited substance; only technically unavoidable traces may be assessed under Article 17

The “below 50 ppm” values are calculated specifications based on an IFRA-compliant oakmoss portion containing less than 100 ppm of each substance. They are not batch results unless confirmed analytically.

A low-atranol or IFRA-compliant designation does not, by itself, establish EU cosmetic compliance. The Responsible Person must assess actual batch values and the technically unavoidable trace provisions of Article 17.

REPRESENTATIVE ALLERGEN PROFILE

EU Fragrance Allergen or Declarable Material	CAS Number	Representative Status in Supplied Product
Evernia Prunastri Extract	90028-68-5	Approximately 50%
Atranol	526-37-4	Restricted to trace specification; batch confirmation required
Chloroatranol	57074-21-2	Restricted to trace specification; batch confirmation required
Limonene	138-86-3 / 5989-27-5	May be naturally present
Linalool	78-70-6	May be naturally present
Eugenol	97-53-0	May be naturally present
Isoeugenol	97-54-1	May be naturally present
Geraniol	106-24-1	May be naturally present
Citral	5392-40-5	May be naturally present
Coumarin	91-64-5	May be naturally present
Benzyl Alcohol	100-51-6	May be present
Benzyl Benzoate	120-51-4	May be present
Farnesol	4602-84-0	Batch dependent
Triethyl Citrate	77-93-0	Present at approximately 50%; not an individually listed fragrance allergen

“May be naturally present” does not certify the presence or concentration of a substance.

QUANTITATIVE STATUS

Assessment	Status
Evernia Prunastri Extract	Approximately 50%
Triethyl Citrate	Approximately 50%
Batch-specific quantitative allergen report supplied	No

Assessment	Status
Batch-specific atranol analysis supplied	No
Batch-specific chloroatranol analysis supplied	No
Other allergens intentionally added	None declared
Precise finished-product label calculation possible	Only for the 50% oakmoss content; other allergens require batch data
EU cosmetic suitability automatically established	No

FINISHED-PRODUCT CALCULATION

For Evernia Prunastri Extract:

Oakmoss extract in finished product (%) =

Dosage of supplied material (%) $\times 50 \div 100$

Example

Where the supplied dilution is used at 0.10%:

$0.10 \times 50 \div 100 = 0.05\%$ Evernia Prunastri Extract

This exceeds both the leave-on and rinse-off declaration thresholds. The finished-product ingredient list must therefore identify Evernia Prunastri Extract.

RESPONSIBILITY OF THE FINISHED-PRODUCT MANUFACTURER

The manufacturer or Responsible Person must:

1. Obtain batch-specific atranol and chloroatranol analysis.
2. Confirm that prohibited constituents are absent or present only as technically unavoidable safe traces.
3. Calculate the concentration of Evernia Prunastri Extract in the finished product.
4. Declare Evernia Prunastri Extract above 0.001% in leave-on products or 0.01% in rinse-off products.
5. Calculate all other fragrance allergens contributed by every raw material.
6. Complete the Cosmetic Product Safety Report.



7. Maintain the Product Information File.
8. Confirm compliance with the laws of every destination market.

CONCLUSION

Aromology Trading LLC declares that:

- The product contains approximately 50% Evernia Prunastri Extract.
- Evernia Prunastri Extract is an individually declarable EU fragrance allergen.
- Declaration is required when the supplied 50% dilution exceeds 0.002% in leave-on products or 0.020% in rinse-off products.
- The product is manufactured from a low-atranol oakmoss grade.
- Batch-specific testing is required to confirm atranol, chloroatranol and other allergen concentrations.
- IFRA conformity does not automatically constitute EU cosmetic compliance.

This declaration is based on representative formulation information and must be supported by batch-specific analytical data for formal regulatory use.

AUTHORISED BY

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