



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

Parameter	Details
Product Name	Rose Centifolia Absolute
Botanical Name	<i>Rosa centifolia</i> L.
Common Name	May Rose Absolute
INCI Name	<i>Rosa Centifolia Flower Extract</i>
CAS No.	84604-12-6
EC No.	283-289-8
FEMA No.	2988
Country of Origin	India
Plant Part Used	Fresh Flowers
Extraction Method	Solvent Extraction
Product Type	Natural Botanical Absolute

The substance is listed by the European Chemicals Agency (ECHA) as Rose, *Rosa centifolia*, extract (CAS 84604-12-6 / EC 283-289-8).

Regulatory Basis

This declaration has been prepared in accordance with:

- Regulation (EC) No. 1223/2009 on Cosmetic Products
- Commission Regulation (EU) 2023/1545
- Annex III – Fragrance Allergens
- Current industry guidance for naturally occurring fragrance allergens

Commission Regulation (EU) 2023/1545 significantly expanded the list of fragrance allergens that must be declared on cosmetic product labels when present above the prescribed thresholds.

Labelling Thresholds

Fragrance allergens shall be declared on the cosmetic ingredient list when present in the finished product above the following concentrations:

Product Type	Declaration Threshold
Leave-on Products	0.001% (10 ppm)
Rinse-off Products	0.010% (100 ppm)

The concentration of each allergen in the finished cosmetic product must be calculated by considering contributions from all fragrance ingredients present in the formulation.

Naturally Occurring Fragrance Allergens

Rose Centifolia Absolute naturally contains numerous fragrance constituents which may require declaration under EU cosmetic legislation.

Fragrance Allergen	CAS No.	Typical Content (%)	Status
Citronellol	106-22-9	4.00–12.00	Present
Geraniol	106-24-1	2.00–8.00	Present
Eugenol	97-53-0	0.30–2.00	Present
Benzyl Alcohol	100-51-6	0.10–0.80	Present
Farnesol	4602-84-0	0.10–1.00	Present
Linalool	78-70-6	0.05–0.80	Present
Limonene	5989-27-5	Trace	May be Present
Citral	5392-40-5	Trace–0.20	May be Present
Benzyl Benzoate	120-51-4	Trace–0.20	May be Present
Benzyl Salicylate	118-58-1	Trace	May be Present
Geranyl Acetate	105-87-3	Trace–0.50	May be Present
Phenethyl Alcohol	60-12-8	Major Constituent	Not a Declarable EU Allergen
Nerol	106-25-2	Naturally Present	Not Independently Listed

The concentrations shown are representative values for commercial Rose Centifolia Absolute and may vary naturally according to origin, climate, harvest season and extraction process.

Traditional EU Fragrance Allergens

Allergen	Status
Alpha-Isomethyl Ionone	Not Expected
Amyl Cinnamal	Not Expected

Amylcinnamyl Alcohol	Not Expected
Anise Alcohol	Not Expected
Benzyl Alcohol	Present
Benzyl Benzoate	May be Present
Benzyl Cinnamate	May be Present (Trace)
Benzyl Salicylate	May be Present
Cinnamal	Not Expected
Cinnamyl Alcohol	Not Expected
Citral	May be Present
Citronellol	Present
Coumarin	Not Expected
Eugenol	Present
Evernia Furfuracea (Treemoss) Extract	Not Present
Evernia Prunastri (Oakmoss) Extract	Not Present
Farnesol	Present
Geraniol	Present
Hexyl Cinnamal	Not Expected
Hydroxycitronellal	Not Expected
Isoeugenol	May be Present (Trace)
Limonene	May be Present
Linalool	Present
Methyl 2-Octynoate	Not Expected

Additional Fragrance Allergens under Regulation (EU) 2023/1545

The following substances or botanical group entries may naturally occur in Rose Centifolia Absolute and are included within the expanded allergen requirements where applicable:

Allergen / Botanical Entry	Status
Rose Flower Extract	Present
Beta-Caryophyllene	May be Present
Geranyl Acetate	May be Present
Terpineol	May be Present
Alpha-Pinene	May be Present
Beta-Pinene	May be Present
Benzaldehyde	May be Present
Methyl Salicylate	May be Present
Vanillin	Trace
Camphene	Trace



Alpha-Terpinene

Trace

Natural occurrence depends upon cultivar, geographical origin, climatic conditions and harvesting practices.

Finished Product Calculation Example

The finished product concentration of each allergen is calculated as follows:

Finished Product Allergen (%) = Ingredient Usage (%) × Allergen Concentration (%) ÷ 100

Example

Rose Centifolia Absolute used at 1.50%

Geraniol content 5.00%

Calculation:

$1.50 \times 5.00 \div 100 = 0.075\%$ Geraniol

Since 0.075% exceeds the declaration threshold for both leave-on and rinse-off cosmetics, Geraniol must be listed on the cosmetic ingredient declaration.

Declaration Summary

Requirement	Status
Natural Botanical Extract	Yes
Contains Declarable EU Fragrance Allergens	Yes
Citronellol	Present
Geraniol	Present
Eugenol	Present
Benzyl Alcohol	Present
Farnesol	Present
Linalool	Present
Citral	May be Present
Limonene	May be Present
Benzyl Benzoate	May be Present
Rose Flower Extract Entry	Present
Batch-specific GC-MS Analysis	Recommended
Finished Product Calculation	Required

Certification

Based on currently available analytical and published compositional information, Rose Centifolia Absolute – India contains naturally occurring fragrance allergens that may require declaration under Regulation (EC) No. 1223/2009, as amended by Commission Regulation (EU) 2023/1545.

Final allergen labelling shall be determined from the concentration of each allergen in the finished cosmetic product.

Disclaimer

This declaration has been prepared using representative analytical information for Rose Centifolia Absolute (CAS 84604-12-6) together with current European cosmetic legislation. Because this material is a natural botanical extract, allergen concentrations may vary due to botanical origin, seasonal variation, geographical location and extraction conditions. Batch-specific GC-MS analysis should be used whenever precise quantitative allergen declarations are required.

The manufacturer or responsible person placing the finished cosmetic product on the market remains responsible for:

- Calculating the concentration of each allergen in the finished formulation.
- Applying the correct ingredient declaration on cosmetic labels.
- Preparing the Cosmetic Product Safety Report (CPSR).
- Maintaining the Product Information File (PIF).
- Ensuring compliance with all applicable EU cosmetic legislation.

Authorised by

Fozia Khot
Director
Aromology Trading LLC