

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 Damascena CO ₂ Extract Premium
Botanical Name	<i>Rosa damascena</i> Mill.
Common Name	Damask Rose CO ₂ Extract
INCI Name	<i>Rosa Damascena Flower Extract</i>
CAS No.	8007-01-0
Botanical Family	Rosaceae
Plant Part Used	Flowers / Petals
Extraction Method	Supercritical Carbon Dioxide Extraction
Product Type	Natural Botanical CO ₂ Extract
Grade	Premium Professional Perfumery Grade
Country of Origin	Bulgaria / Turkey / Morocco (Batch Dependent)
Carrier / Diluent	None, unless otherwise declared
Purity	100% natural extract

Regulatory Basis

This declaration has been prepared with reference to:

- Regulation (EC) No. 1223/2009 on cosmetic products
- Commission Regulation (EU) 2023/1545
- Annex III of the EU Cosmetics Regulation
- The fragrance-allergen declaration thresholds applicable to finished cosmetic products
- Representative compositional information for natural *Rosa damascena* CO₂ extract

Commission Regulation (EU) 2023/1545 amended the EU Cosmetics Regulation by expanding the fragrance allergens requiring individual labelling in cosmetic products.

EU Fragrance-Allergen Labelling Thresholds

An individual fragrance allergen must be declared in the finished cosmetic product ingredient list when its concentration exceeds:

Finished Product Type	Declaration Threshold
Leave-on Products	0.001% – 10 mg/kg
Rinse-off Products	0.010% – 100 mg/kg

These thresholds apply to the concentration of each allergen in the finished cosmetic product.

The contribution from Rose Damascena CO₂ Extract Premium must be added to contributions from all other ingredients in the formulation.

Traditional EU Fragrance-Allergen Profile

The following table covers the traditional individually declarable fragrance allergens historically listed under Annex III.

Fragrance Allergen	CAS No.	Representative Content in Raw Material (%)	Declaration Status
Alpha-Isomethyl Ionone	127-51-5	Not expected	Not Present
Amyl Cinnamal	122-40-7	Not expected	Not Present
Amylcinnamyl Alcohol	101-85-9	Not expected	Not Present
Anise Alcohol	105-13-5	Not expected / Trace	Not Expected
Benzyl Alcohol	100-51-6	0.20–1.00	Present
Benzyl Benzoate	120-51-4	Trace–0.20	May Be Present
Benzyl Cinnamate	103-41-3	Not expected	Not Present
Benzyl Salicylate	118-58-1	Trace–0.10	May Be Present
Cinnamal	104-55-2	Not expected	Not Present
Cinnamyl Alcohol	104-54-1	Not expected	Not Present
Citral	5392-40-5	Trace–0.30	May Be Present
Citronellol	106-22-9	15.00–35.00	Present
Coumarin	91-64-5	Not expected / Trace	Not Expected
Eugenol	97-53-0	0.20–3.00	Present
Evernia Furfuracea Extract	90028-67-4	Not expected	Not Present
Evernia Prunastri Extract	90028-68-5	Not expected	Not Present
Farnesol	4602-84-0	0.20–3.00	Present
Geraniol	106-24-1	8.00–25.00	Present
Hexyl Cinnamal	101-86-0	Not expected	Not Present
Hydroxycitronellal	107-75-5	Not expected	Not Present

Hydroxyisohexyl 3-Cyclohexene Carboxaldehyde	31906-04-4	Not expected	Not Present
Isoeugenol	97-54-1	Trace-0.20	May Be Present
Limonene	5989-27-5	Trace-1.00	May Be Present
Linalool	78-70-6	0.20-3.00	Present
Methyl 2-Octynoate	111-12-6	Not expected	Not Present

Representative Quantitative Allergen Results

Fragrance Allergen	Representative Result (%)	Equivalent mg/kg	Status
Citronellol	27.80	278,000	Present
Geraniol	16.40	164,000	Present
Farnesol	1.40	14,000	Present
Eugenol	1.10	11,000	Present
Linalool	0.90	9,000	Present
Benzyl Alcohol	0.60	6,000	Present
Limonene	0.10	1,000	Present
Citral	0.08	800	May Be Present
Isoeugenol	0.05	500	May Be Present
Benzyl Benzoate	0.04	400	May Be Present
Benzyl Salicylate	0.01	100	May Be Present

The values above are representative formulation-support values and are not batch-specific laboratory results.

Additional Allergens under Regulation (EU) 2023/1545

Commission Regulation (EU) 2023/1545 expanded the number of fragrance allergens subject to individual labelling requirements.

The following additional substances or grouped entries may be naturally present or analytically relevant in Rose Damascena CO₂ Extract Premium.

Expanded Fragrance Allergen / Constituent	CAS No.	Representative Status
Geranyl Acetate	105-87-3	Present / May Be Present
Neryl Acetate	141-12-8	May Be Present
Beta-Caryophyllene	87-44-5	May Be Present
Alpha-Pinene	80-56-8	Trace / May Be Present
Beta-Pinene	127-91-3	Trace / May Be Present
Terpineol	8000-41-7	May Be Present
Alpha-Terpinene	99-86-5	Trace / May Be Present

Gamma-Terpinene	99-85-4	Trace / May Be Present
Terpinolene	586-62-9	Trace / May Be Present
Linalyl Acetate	115-95-7	Trace / May Be Present
Benzaldehyde	100-52-7	Trace / May Be Present
Methyl Salicylate	119-36-8	Trace / May Be Present
Rose Ketone Derivatives	Various	Trace / May Be Present
Rosa Damascena Flower Oil / Extract Group	Various	Present as Product Identity

The legal ingredient name used on the finished cosmetic label must correspond to the applicable Annex III entry and current EU labelling requirements.

Representative Expanded-Allergen Profile

Constituent	Representative Concentration (%)	Status
Geranyl Acetate	0.80	Present
Beta-Caryophyllene	0.15	May Be Present
Neryl Acetate	0.12	May Be Present
Alpha-Pinene	0.08	May Be Present
Beta-Pinene	0.05	May Be Present
Terpineol	0.04	May Be Present
Benzaldehyde	0.02	May Be Present
Methyl Salicylate	0.01	May Be Present
Other Expanded Allergens Below reporting limit or not determined Batch Review Required		

Approximate Raw Material Levels before Allergen Declaration

Allergen	Representative Content in Extract (%)	Approximate Extract Level before Leave-on Threshold	Approximate Extract Level before Rinse-off Threshold
Citronellol	27.80	0.0036%	0.0360%
Geraniol	16.40	0.0061%	0.0610%
Farnesol	1.40	0.0714%	0.7143%
Eugenol	1.10	0.0909%	0.9091%
Linalool	0.90	0.1111%	1.1111%
Benzyl Alcohol	0.60	0.1667%	1.6667%
Limonene	0.10	1.0000%	10.0000%
Citral	0.08	1.2500%	12.5000%
Isoeugenol	0.05	2.0000%	20.0000%
Benzyl Benzoate	0.04	2.5000%	25.0000%

These values are illustrative and must not replace calculations using actual batch data.

Declaration Summary

Requirement	Status
Natural Botanical Extract	Yes
Contains Declarable Fragrance Allergens	Yes
Citronellol	Present
Geraniol	Present
Farnesol	Present
Eugenol	Present
Linalool	Present
Benzyl Alcohol	Present
Limonene	Present / May Be Present
Citral	May Be Present
Isoeugenol	May Be Present
Benzyl Benzoate	May Be Present
Benzyl Salicylate	May Be Present
Expanded EU Allergens	Present or Potentially Present
Batch-Specific GC-MS Review	Required
Finished-Product Calculation	Required

Certification Statement

Based on representative compositional information, Rose Damascena CO₂ Extract Premium contains naturally occurring fragrance allergens that may require individual declaration under Regulation (EC) No. 1223/2009, as amended by Commission Regulation (EU) 2023/1545.

The principal allergens expected are:

- Citronellol
- Geraniol
- Farnesol
- Eugenol
- Linalool
- Benzyl Alcohol
- Limonene
- Citral
- Isoeugenol
- Benzyl Benzoate
- Benzyl Salicylate

Final finished-product labelling must be determined using:

- Batch-specific allergen concentrations
- The concentration of the extract in the finished product

- Contributions from all other ingredients
- The appropriate leave-on or rinse-off threshold
- The current consolidated version of Annex III
- The finished-product safety assessment

Disclaimer

This EU Fragrance Allergen Declaration is a professional representative template prepared using typical compositional information for natural Rose Damascena CO₂ extracts.

The quantitative values stated in this document are not evidence of laboratory testing of a specific production batch. Before signing, stamping or issuing this declaration, all values must be replaced or verified using:

- The original producer's allergen declaration
- Batch-specific GC-MS analysis
- Quantitative allergen testing
- The producer's Certificate of Analysis
- The correct analytical reporting limits
- The current consolidated EU Cosmetics Regulation

This declaration applies only to the raw material identified herein and does not certify the regulatory compliance of a finished perfume, cosmetic, personal-care or household product.

The finished-product manufacturer, importer or EU Responsible Person remains responsible for:

- Confirming the product identity and CAS number
- Confirming the applicable INCI name
- Calculating cumulative allergen concentrations
- Applying the correct ingredient-list declarations
- Preparing the Cosmetic Product Safety Report
- Maintaining the Product Information File
- Ensuring compliance with Regulation (EC) No. 1223/2009
- Ensuring compliance with Commission Regulation (EU) 2023/1545
- Reviewing subsequent regulatory amendments
- Ensuring that the finished-product label is accurate and legally compliant
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Authorised by

Fozia Khot
Director
Aromology Trading LLC