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IFRA COMPLIANCE STATEMENT

IFRA Standards – 51st Amendment

Supplier

Aromology Trading LLC

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PRODUCT INFORMATION

Item	Details
Product Name	French Rose Oil Otto
Alternative Name	Rose Otto Essential Oil
Botanical Name	<i>Rosa damascena</i> Mill.
INCI Name	Rosa Damascena Flower Oil
CAS Number	8007-01-0
EC Number	290-260-3
Country of Origin	France
Extraction Method	Steam distillation or hydrodistillation of fresh flowers
Material Type	Natural Complex Substance
Issue Date	17 July 2026
IFRA Amendment Evaluated	51 st Amendment

2. CERTIFICATE STATEMENT

Aromology Trading LLC confirms that **French Rose Oil Otto – *Rosa damascena* Mill.** has been reviewed with reference to the IFRA Standards published under the **51st Amendment**.

The material is a **Natural Complex Substance** whose composition varies naturally between production batches. Its suitability and maximum use concentration in a finished product cannot be determined solely from the generic product name.

The complete oil is not assigned a single universal maximum concentration across all IFRA categories. Compliance must be calculated using:

- The actual concentration of restricted constituents in the relevant production batch.
- The intended IFRA finished-product category.



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- The applicable limit for each restricted constituent.
- Contributions of the same restricted constituent from every ingredient in the fragrance formulation.
- Any other applicable IFRA specification, prohibition or purity requirement.

IFRA's Certificate of Conformity is a supplier declaration and does not replace the safety assessment of the finished product. IFRA does not itself certify individual products or issue certificates on behalf of suppliers.

3. REPRESENTATIVE RESTRICTED CONSTITUENTS

The following substances may occur naturally in steam-distilled *Rosa damascena* flower oil and must be considered when present in the actual batch:

Constituent	CAS Number	Representative Raw-Material Content	Assessment Requirement
Methyl Eugenol	93-15-2	Approximately 0.39%	IFRA-restricted constituent; calculate category-specific contribution
Eugenol	97-53-0	Approximately 0.82%	Include in applicable IFRA and sensitisation assessment
Citral	5392-40-5	Approximately 0.14%	Include in applicable category calculation
Farnesol	4602-84-0	Approximately 1.10%	Include in applicable category calculation
Geraniol	106-24-1	Approximately 18.65%	Include in sensitisation and finished-product assessment
Citronellol	106-22-9	Approximately 32.40%	Include in sensitisation and finished-product assessment
Linalool	78-70-6	Approximately 1.25%	Oxidation and sensitisation considerations
Limonene	138-86-3	Approximately 0.48%	Oxidation and sensitisation considerations

The IFRA 51st Amendment documentation includes natural-contribution data for restricted constituents such as methyl eugenol. The actual batch result must be used for conformity calculations rather than a generic or representative percentage.

4. IFRA CATEGORY DECLARATION

IFRA Category	Representative Product Types	Maximum Use Status
Category 1	Lip products	Batch-specific constituent calculation required



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Category 2	Deodorants and antiperspirants	Batch-specific constituent calculation required
Category 3	Eye-area and certain intimate-use products	Batch-specific constituent calculation required
Category 4	Fine fragrance and hydroalcoholic fragrances	Batch-specific constituent calculation required
Category 5A	Body creams, lotions and leave-on body products	Batch-specific constituent calculation required
Category 5B	Face moisturisers	Batch-specific constituent calculation required
Category 5C	Hand creams	Batch-specific constituent calculation required
Category 5D	Baby creams, oils and talcs	Batch-specific constituent calculation required
Category 6	Oral-care and lip-exposure products	Batch-specific constituent calculation required
Category 7A	Rinse-off hair treatments with hand contact	Batch-specific constituent calculation required
Category 7B	Leave-on hair products and treatments	Batch-specific constituent calculation required
Category 8	Certain intimate-contact products	Batch-specific constituent calculation required
Category 9	Rinse-off body and hair products	Batch-specific constituent calculation required
Category 10A	Household products with hand contact	Batch-specific constituent calculation required
Category 10B	Aerosol and mechanically delivered air-care products	Batch-specific constituent calculation required
Category 11A	Products with intended skin contact and potential transfer	Batch-specific constituent calculation required
Category 11B	Products with incidental or limited skin contact	Batch-specific constituent calculation required
Category 12	Products without intended direct skin contact	Batch-specific constituent calculation required

Important Interpretation

Batch-specific constituent calculation required means that a valid numerical maximum for the complete oil cannot be issued without:

1. A batch-specific GC–MS or compositional certificate.
2. Identification of the intended IFRA category.
3. The concentration of the oil in the fragrance compound.
4. The concentration of the fragrance compound in the finished product.
5. The contribution of restricted constituents from all other raw materials.



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It must not be interpreted as unlimited use.

5. CALCULATION PRINCIPLE

The maximum permissible use of the natural oil based on a restricted constituent may be calculated as follows:

Maximum oil concentration in finished product = applicable constituent limit ÷ constituent fraction in the oil

For example, where a batch contains **0.39% methyl eugenol**, the fraction used in the calculation is **0.0039**.

The resulting maximum must then be compared against the limits derived from every other applicable restricted constituent. The lowest calculated value governs the finished formulation.

This example explains the calculation method only and does not assign an IFRA maximum to the product.

6. CUSTOMER RESPONSIBILITY

The fragrance manufacturer or finished-product manufacturer is responsible for:

- Selecting the correct IFRA category.
- Using the current batch-specific analytical composition.
- Calculating the total contribution of restricted constituents from all ingredients.
- Applying the most restrictive applicable standard.
- Conducting an appropriate toxicological and cosmetic safety assessment.
- Ensuring compliance with all national and regional legal requirements.
- Confirming whether a later IFRA Amendment must also be applied.

This certificate applies only to the raw material identified above. It does not constitute approval of any finished perfume, cosmetic or consumer product.

7. DECLARATION

Based on the information available at the issue date, **French Rose Oil Otto – Rosa damascena Mill.** may be used in fragrance formulations provided that:

- Batch-specific restricted constituents are quantified.
- All applicable IFRA 51st Amendment Standards are observed.
- The correct finished-product category is applied.



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- The complete formulation is assessed for safety and regulatory compliance.

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