

POLICY FACT SHEET

Fragrance Ingredient Secrecy Poses Public Health Risks

A fragrance used in a cleaning product or personal care product can be comprised of tens to hundreds of individual fragrance ingredients. There are over 3,200 chemicals known to be used in fragrance, yet information on the specific ingredients in any one fragrance is kept secret from consumers, researchers, and regulators. Instead, an ingredient list found on a product containing fragrance will merely list the word “fragrance.” Several common fragrance ingredients pose potential human health impacts, from eye and skin irritation and breathing problems to more serious impacts like increased risk of breast cancer and hormone disruption. The absence of required fragrance ingredient disclosure makes it impossible for individuals to avoid the specific substances in fragrance that may impact their health. Furthermore, it makes it impossible for researchers to adequately evaluate the safety of the ingredients found in fragrances, or for regulators to take appropriate action on potential chemicals of concern found in fragrance.



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What are the Health Concerns Regarding Fragrance Ingredients?

FRAGRANCE ALLERGENS

A significant portion of the population in the US suffers from fragrance-related allergies. Almost 20% of the general population is sensitized to at least one allergen and studies find that fragrance is one of the most frequently identified substances causing allergic reactions. If sensitized to a fragrance allergen, the only way to prevent allergic reactions is to avoid exposure to products containing the problem allergen. This is virtually impossible to do when fragrance allergens are not disclosed on products. In trying to treat a reaction, the only advice a dermatologist can provide is to choose “fragrance-free” products. Fragrance-free products are extremely limited and are simply not a fair choice to offer the millions of Americans who are sensitized to fragrance. For example, 96% percent of shampoos, 98% of hair conditioners and 97% of hair styling products contain fragrance. The failure of manufacturers to disclose fragrance ingredient information to their consumers, or even to health care providers, results in many people suffering from unnecessary exposures and suboptimal patient care by doctors. If fragrance ingredients were disclosed, health care providers could more specifically diagnose problem allergens for their patients, and patients would have a considerably easier time finding products they can tolerate.



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ALLERGENS

Twenty-six allergens that are components of fragrance must be listed on the labels of cosmetics and cleaning products sold in the European Union (E.U.). This is done so that people who are allergic to these substances can avoid using products which contain them. If companies are labeling allergens in the E.U., why are they still allowed to keep them a secret from consumers in the United States?

- Alpha isomethylionone
- Amyl cinnamal
- Amylcinnamyl alcohol
- Anisyl alcohol
- Benzyl alcohol
- Benzyl benzoate
- Benzyl cinnamate
- Benzyl salicylate
- Butylphenyl methylpropional (Lilial)
- Cinnamal
- Cinnamyl alcohol
- Citral
- Citronellol
- Coumarin
- Eugenol
- Farnesol
- Geraniol
- Hexyl cinnamal
- Hydroxycitronellal
- Hydroxyisohexyl 3-cyclohexene carboxaldehyde (Lyral)
- Isoeugenol
- Limonene
- Linalool
- Methyl 2-octynoate
- Evernia furfuracea (Treemoss) extract
- Evernia prunastri (Oakmoss) extract

HAZARDOUS CHEMICALS IN FRAGRANCE

The International Fragrance Association (IFRA) publishes a list of over 3,200 chemicals used by their member companies in producing fragrance. Highlighted here are some notable hazardous chemicals included in the list.

PHTHALATES: There are two forms of phthalates, diethyl phthalate (DEP) and diisononyl phthalate (DINP). DINP is an endocrine disrupter, meaning it can interfere with the hormone system, and is linked to reproductive harm. Exposure to DEP has been associated with decreased sperm counts and decreased anogenital distance in baby boys.

CARCINOGENS: There are ten chemicals that have been listed as reasonably anticipated to cause cancer in humans. These chemicals include: p-dichlorobenzene, pyridine, styrene, styrene oxide, methyl eugenol, acetaldehyde, methyl isobutyl ketone, 2,4 hexadienal, titanium oxide and butylated hydroxyanisole.

SYNTHETIC MUSKS: Several synthetic musks are used in fragrance including galaxolide, tonalide and musk ketone. Research indicates that synthetic musks are persistent, can bioaccumulate, are potential hormone disruptors, and may break down the body's defenses against other toxic chemical exposure.

DISINFECTANTS: Fragrance can also include harsh disinfectant chemicals like triclosan and ammonium

quaternary compounds. These chemicals are linked to endocrine disruption and asthma.

UNKNOWN HAZARDS: Other chemicals on the IFRA list are of concern because they have little health and safety data associated with them. One report by the European Union Scientific Committee on Consumer Safety identified 39 fragrance ingredients used in high volumes which had no human safety data associated with them at all. Unfortunately, the fragrance industry has not publicly released information on how commonly any of these chemicals are used, how much of the chemicals they add to the products, or in which types of fragranced products they are found.

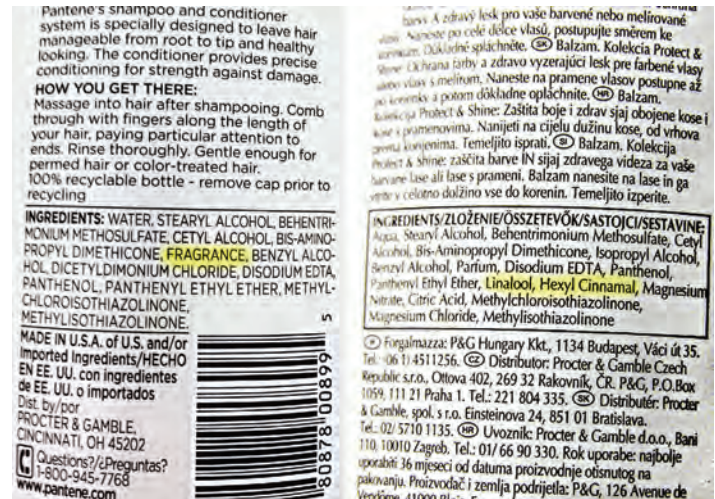


Current Regulation of Fragrance Ingredients

Chemicals used in fragrance are virtually unregulated by governmental agencies in the United States. Neither the Food and Drug Administration (FDA) nor the Environmental Protection Agency (EPA) has direct authority to monitor or require safety testing for fragrances used in cleaning products or cosmetics. Instead, the International Fragrance Research Association (IFRA), an industry trade group, sets standards for fragrance manufacturers and facilitates safety reviews of fragrance ingredients.

IFRA publishes a Code of Practice, which is a set of voluntary standards for manufacturers of fragrance. However, there remains an inherent conflict of interest when a trade group funded by industry holds the responsibility for regulating itself. For example, the headquarters of IFRA in Geneva, Switzerland, is located at the same address as the head office of Givaudan, a global fragrance manufacturer with the largest international market share. IFRA also coordinates an independent expert panel of dermatologists, toxicologists and environmental scientists called REXPAN, which is responsible for conducting safety assessments of fragrance ingredients. The safety assessments conducted by REXPAN are not entirely transparent. Although the safety assessments are published in publicly available scientific journals, a large proportion of the data on which the conclusions are based is unpublished research provided by the manufacturers themselves. This unpublished data is not made available to public scrutiny. In addition, compliance with the IFRA standards on prohibited and restricted fragrance chemicals is voluntary for manufacturers. There is little to no enforcement of these standards internationally.

Additionally, fragrance ingredients are not currently required by US law to be disclosed. Ingredients in cosmetic products are required to be declared on the label by the Food, Drug and Cosmetic Act, with the exception that fragrance ingredients may be listed collectively as "fragrance." There are currently no requirements for ingredients in cleaning products to be disclosed on the label or elsewhere, with the exception



U.S. Pantene® conditioner label (left) vs. E.U. Pantene® conditioner label (right).

of active ingredients in antibacterial products, which fall under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).

Voluntary Disclosure Doesn't Work

In 2010, the cleaning product industry launched its voluntary Consumer Product Ingredient Communication Initiative. The intention of the Initiative was to increase disclosure of ingredients in air care products, automotive care products, cleaning products, and polishes and floor products. Under the initiative, companies are encouraged to disclose all ingredients in the product (except for contaminants or incidental ingredients) on the product label, or a website, 1-800 number or other non-electronic means. In 2011 the Initiative was amended to include, among other things, the recommendation that companies provide additional information on fragrance by linking to the International Fragrance Association's master fragrance list or creating a company-specific palette of fragrance ingredients. However, very few companies are actually following the Initiative's recommendations. For example, of the approximately 26 cleaning product companies who are members of the American Cleaning Institute (ACI) and the Consumer Specialty Product Association (CSPA) only 3 companies provide consumers with a master list of fragrance ingredients used in their products: Clorox, Procter and Gamble, and SC Johnson and Son. Only one company, Reckitt Benckiser, includes a link on its website to the International Fragrance Association's master

fragrance list. The public needs mandatory, consistent ingredients disclosure that is standardized across the industry in order to meaningfully provide consumers with the information they need to decide what products they want to use in their home. Disclosure should be product-specific. A master list of fragrance does little good if consumers don't know which products the ingredients are used in.

The U.S. versus the E.U.

The United States is falling behind in ingredient labeling standards. The European Union has established a list of 26 common allergens that must be listed as ingredients in cosmetic and cleaning products. Companies are already disclosing the allergens they use in products sold in the E.U.; consumers in the United States deserve the same information.

The Intellectual Property Argument for Blanket Fragrance Trade Secrets is Unconvincing

The argument for withholding all fragrance ingredient information as vital trade secrets simply wears thin given today's reverse engineering technology. Fragrance companies, their competitors and even counterfeiters have the ability to deconstruct and thereby recreate fragrances. While these copies may not be identical in formula given the complexities of creating a fragrance, they are often close enough for the average consumer. A simple list of fragrance ingredients (without percentages or other key formulation details) poses almost no additional risk to the intellectual property of these companies.



To learn more, read the report **Secret Scents: How Hidden Fragrance Allergens Harm Public Health** at womensvoices.org/secretscents