

Member Associations
Members of IFRA Committees
Cc: RIFM
Members of the JAG
Downstream User Associations

September 27, 2021

Information Letter 1127

Subject: Clarifications related to the implementation of IFRA Standards and products with potential lip exposure

Related IL: 1107

Description:

With IL 1107 (March 2, 2021) we provided a number of clarifications related to categorization of products and also multiple use products with regard to IFRA Standards, resulting from the updated category system introduced with the 49th Amendment.

Some additional clarification appears necessary related to product types that can have some use on the lips, for which the exposure scenario concerning their potential for ingestion is significantly different to the one for products targeted in Category 1. In the latter group their exposure scenario leads to the additional requirements for flavor status of the materials used (see Guidance for the Use of the IFRA Standards, 1.6.2 Oral Care Products and other products with the potential for ingestion).

IFRA together with RIFM concluded that Category 1 is for those products typically applied to the lips several times a day and to remain there for a longer period of time (leave-on, like lipstick) as a designed function of the products, which therefore have a potential for ingestion. There are other products for which the exposure of fragrance ingredients to the lips is minimal due to the products being wiped or rinsed off (see IL 1107). For such cases where there may be *minimal* exposure to the lips, we consider the potential for ingestion to be negligible.

In IL 1107 we had pointed out that if a product is designed and clearly marketed for lips as well as for other application(s), then the product must follow the requirements of Category 1 regarding its potential for ingestion. Here, some further clarification appears useful by adding that this is only the case where, in addition, the resulting exposure conditions are similar to the products targeted in Category 1. Therefore, for example, a makeup remover also suitable for lips is still considered similar to a make-up remover marketed for 'face', which includes the lip area anyhow. Those products are not considered having exposure conditions e.g., comparable to a lipstick and therefore do not automatically fall under the requirements as described in section 1.6.2 of the Guidance. However, products designed and clearly marketed for leave-on use on lips as well as for other application(s), such as Lip & Cheek Blush or Tints, therefore should follow the requirements of Category 1.

The other rules described in IL 1107 regarding multiple use products remain unaffected from this clarification.

This additional clarification along with the complementary information in IL 1107 will be included in the next updated version of the Guidance for the Standards, which will be issued along with the next regular amendment to the IFRA Standards.

Contact:

We hope you find this information helpful. If you have any further questions, please write to Matthias Vey (mvey@ifrafragrance.org) or Jennifer Dorts (jdorts@ifrafragrance.org)

Best regards,

IFRA