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Members of IFRA Committees

Cc RIFM
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Client Associations

December 16, 2010

Information Letter 896
IFRA: Compliance and the role of the IFRA Certificate

Dear Colleagues,

In order to ensure a common understanding within IFRA membership and stakeholders, the IFRA Scientific Committee wishes to broadly communicate on what IFRA compliance means and the role the IFRA Certificate can play. This information letter aims to clarify the responsibilities of all parties involved when it comes to IFRA compliance. In addition this IL also introduces a new version of the IFRA Certificate template which should serve as a reference from now on.

IFRA Safety Compliance for **IFRA members** requires full adherence to all elements of the IFRA Code of Practice.

A fragrance manufacturer is deemed in violation of the Code when it does not follow mandatory provisions of the Code or when it places on the market a fragrance or a fragrance ingredient that is not safe for its intended use and/or not in compliance with IFRA Standards because:

- a) It contains or is an ingredient used in violation of a Standard; or
- b) It contains or is an ingredient that has not been evaluated in accordance with section 4 of the IFRA CoP for general safety assessment.

Section 4 mandates that ingredients in fragrances should only be used when, based on appropriate information and evaluation, it has been concluded they do not present an unreasonable risk to human health and the environment and are safe under their intended conditions of use.

IFRA compliance for IFRA members therefore goes beyond the 'simple' compliance with the IFRA ingredient Standards, and requires assurance of safety for all ingredients used in fragrances under the conditions of intended consumer use.

IFRA compliance is typically expressed by 2 different documents: 1) IFRA Compliance Certificate; and 2) Safety Assessment.

The IFRA Compliance Certificate serves to express compliance with the relevant IFRA Standards and the safety endpoints of concern (e.g. sensitization) specified therein. The resulting supported use level in a given application specified in the IFRA Compliance Certificate only relates the safety endpoints addressed by the relevant IFRA Standards.

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The IFRA Compliance Certificate therefore can be issued by anybody who is familiar with the Code of Practice and the associated Standards. It can therefore also be used by **non-members** to declare that they comply with the IFRA Standards.

The Certificate confirms that a specific fragrance compound up to a certain concentration can be used in a specified consumer product in compliance with a specific Amendment to the IFRA Standards (the date of the Amendment should be stated in the Certificate).

On the other hand, the Safety Assessment reflects the internal expertise of the company with regards to the full safety assessment of all ingredients in the fragrance compound (i.e. not just those with IFRA Standards). It cannot be issued in the name of IFRA but follows its compliance philosophy as reflected in section 4 of the IFRA Code of Practice (i.e. all substances used in a fragrance have justification which supports its safe use).

We hope that this letter will provide you with clarifications and remain at your disposal for any questions.

Very Best regards,

Matthias Vey
IFRA Scientific Director

Frédéric Lebreux
IFRA Scientific and Regulatory Affairs Manager

Attachment: IFRA Certificate Compound (template)