

**www.cropwatch.org**



THE FIRST TRULY INDEPENDENT WATCHDOG FOR THOSE  
WORKING WITH NATURAL AROMATIC MATERIALS

E: [info@cropwatch.org](mailto:info@cropwatch.org) T: ++44 (0)7771 872 521

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**Campaign to Boycott the 40<sup>th</sup> IFRA Amendment.**  
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**Europe: A Hostile Environment for Perfumery & Natural Aromatics Trading.**

The aroma trade (perfumes, flavourings, essential oils, aromatherapy, herbal medicine etc) has gone through a critical period in the last few years. Large aroma manufacturers are deserting Europe, and raw materials manufacturing in India & China has blossomed, to the extent that it now represents the future focus of the industry. Part of the reason for this manufacturing migration is to do with market place economics, lower labour costs etc, but part of it is also due to **the hostile environment that Brussels regulators have created for the aroma trade** with its high level of hyperbureaucratic technocracy. Perfumery especially, has become so bound by red tape that the profession spends more time working with software safety programs, than it does with smelling strips. The rise of newly important posts in aroma concerns, like that of the 'Regulatory Affairs Manager', has further devolved focus and power away from perfumery excellence, as company executives worry more about anti-fragrance campaigners & regulatory complicity, than they do about the integrity of the perfumery art.

**The Quantitative Risk Assessment (QRA) Approach.**

We now have to accept that IFRA are part of the Brussels regulatory regime. As part of the 40<sup>th</sup> Amendment of the IFRA Code of Practice, we have the prospect of even more red tape – the incredibly complex QRA approach to perfume safety (see <http://www.ifraorg.org:80/News.asp>). Many perfumers consider there was nothing wrong with the previous leave on/wash off system for perfumery safe working, but it seems that we poor technical drones now have to dance to whichever is the latest tune being played by career toxicologists & dermatologists, who seem to be so very, very overly influential in cosmetics regulatory affairs. No-one concerned actually thinks to ask whether the fragrance trade – especially its smaller concerns - can actually cope with mountains of paperwork these regulatory requirements generate, and the essential oil traders & aroma ingredients sellers are caught up in this legislation too, traders having to provide detailed IFRA Certificates for each ingredient to each customer.

Cropwatch has been considering evidence for whether this continual paperwork avalanche of cosmetics legislation & 'best practice' has actually made retailed fragrances any safer – believing, at this point, that the answer is most probably no, since, for example, fragrance sensitivity continues its' upward rise in many EU countries. Nobody in the SCCP seems to have resigned, however, over this failure, although to her credit, the Cosmetics Sector Head of Unit, Mrs. Sabine Lecrenier has taken up Cropwatch's request for SCCP reform with the Secretariat of the SCCP. This follows submitted proof of the SCCP's abysmal & inadequate track record to date (flawed Opinions on natural aromatic products). Cropwatch has subsequently pointed out that we feel that the SCCP is hardly in a position to properly investigate itself, and to remedy its own failings & shortcomings, and we believe that the EU Ombudsman will agree with us.

Amusingly, readers may have seen the detail in the announcement that IFRA is to organise the independent analysis of retailed perfumes of IFRA member companies in various countries, in order to force its members to adhere to IFRA's perfumery standards, or be publicly named & shamed on the IFRA website. Well, we have some advice for existing IFRA members.

### **LEAVE!**

If they do so, we strongly recommend that they join Cropwatch to help to generate alternative policies for perfumery safety which will not destroy what's left of the industry & further, to help us oppose faulty SCCP Opinions on perfumery ingredients. Behind the scenes, Cropwatch has already forced some changes in moves relating to Cosmetics sector legislation, and has helped stop regulatory moves which have defied common-sense – help us to do more! In a development that must worry the existing Corporate Perfumery Industry - Brussels Lawyers Alliance, manufacturers of natural aromatic ingredients, too, are starting to work with Cropwatch to see if, together, we can produce strategies for the production of aromatic commodities which circumvent or eliminate the basis of the existing regulatory restrictions on the materials, and keep natural ingredient producers in continued employment. In this way, Cropwatch is attempting to be part of the solution, rather than part of the problem, unlike the SCCP.

### **Boycott Call.**

Meanwhile we are floating the possibility that an ad-hoc group could be formed to resist universal implementation IFRA's 40<sup>th</sup> Amendment, on the grounds that it discriminates against small industries, which cannot afford the time and effort to put it into practice. Many of us, of course, have fundamental misgivings about the science involved anyway. Please get in touch with at [info@cropwatch.org](mailto:info@cropwatch.org) if you would like to support us in this. Implicit in this, is the belief that existing fragrance safety studies largely benefit the continued employment prospects of toxicologists, whereas studies of adverse reactions in end-users probably deserves far more attention (such an input has been previously promised by Ian

White, Chairman of the SCCP, but, of course, has never materialized in any effective way).

Our two proposed main area of focus:

1. To form an Opinion on whether perfume safety has measurably increased (or not) in recent years, in spite of excessive EU regulation/increasingly restrictive IFRA Amendments on fragrance ingredients.
2. To critique the QRA protocol, and to compare adverse end-user fragrance reactions under the QRA proposals, vs. adverse end-user reactions under the more familiar leave on/wash off system.

These studies would provide evidence to support our intended petitioning of the Ombudsman later this year, claiming that excessive EU cosmetics regulation is serving no safety purpose, is costing industry a huge amount of money it hasn't got, and is causing unnecessary hardship & unemployment for natural aromatic ingredient producers.

### **The Pro-Synthetics Stance of the EU Cosmetics Sector.**

The ongoing policy direction of the Cosmetics section of the EU Commission then, is effectively condemning EU cosmetic/fragrance consumers to a synthetic chemical future, via the progressive & continuous assaults, often on dubious toxicological grounds, on the freedom to use, formulate with, & to buy, products which contain natural aromatic ingredients. These regulations against natural ingredients are biting deeper & deeper, such that incoming new perfumers do not have the skills to create fragrances with natural materials any more, as they are only expert in synthetic (Corporate) perfumery.

Cropwatch believes the right for EU fragrance consumers to choose natural perfumes composed entirely of natural ingredients, is a basic human right, and this principle should be tested in law. The current demand for 100% natural perfumes - and now even a demand for 100% organic perfumes - is high in the EU marketplace. However perfumery companies cannot legally place many traditional natural perfume types on the marketplace (e.g. citrus colognes, fougères etc.) because of existing regulations and red tape which work against formulation with natural ingredients. But fragrance consumers don't want 100% synthetic perfumes – they have noticed that they smell unfinished, 'chemical' & disgusting - they want perfumes composed either of both natural & synthetic ingredients, or of 100% natural ingredients, and Cropwatch can't see why EU fragrance consumers should have them.

### **Final Call!**

The prospect is that the 40th IFRA Amendment will eventually become incorporated into the EU Cosmetics Directive. This seems to be the pattern with other IFRA policies which are effectively rubber-stamped by the SCCP, labeled as an "Opinion", and adopted into the regulatory framework. Its time to stop this

excessive intrusion of bureaucracy dead in its tracks - these assaults on formulatory freedom in perfumery are as moronic as the burning of books: so let's restore perfumery as a high art form once more and ignore these turbulent regulators!

Tony Burfield  
on behalf of Cropwatch  
[www.cropwatch.org](http://www.cropwatch.org)