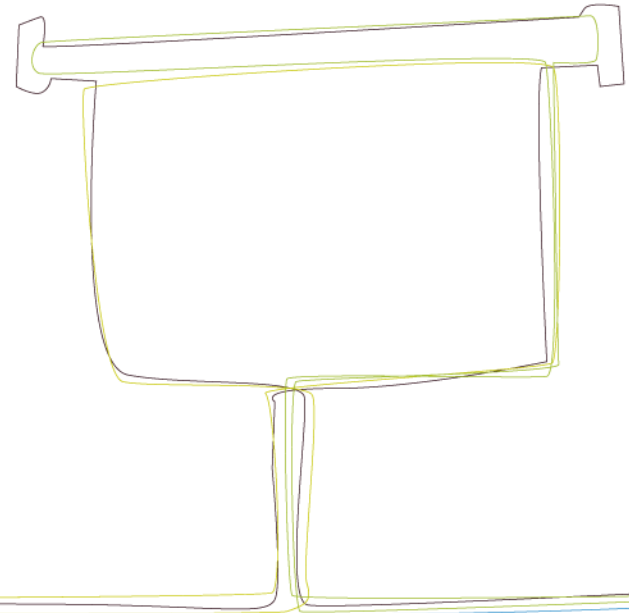


Fourth session Communication

How IFRA is addressing the
recommendations made at the first
IDEA QRA Workshop



Communication – improve the dialogue with the dermatologists

Revise the IFRA Standards process



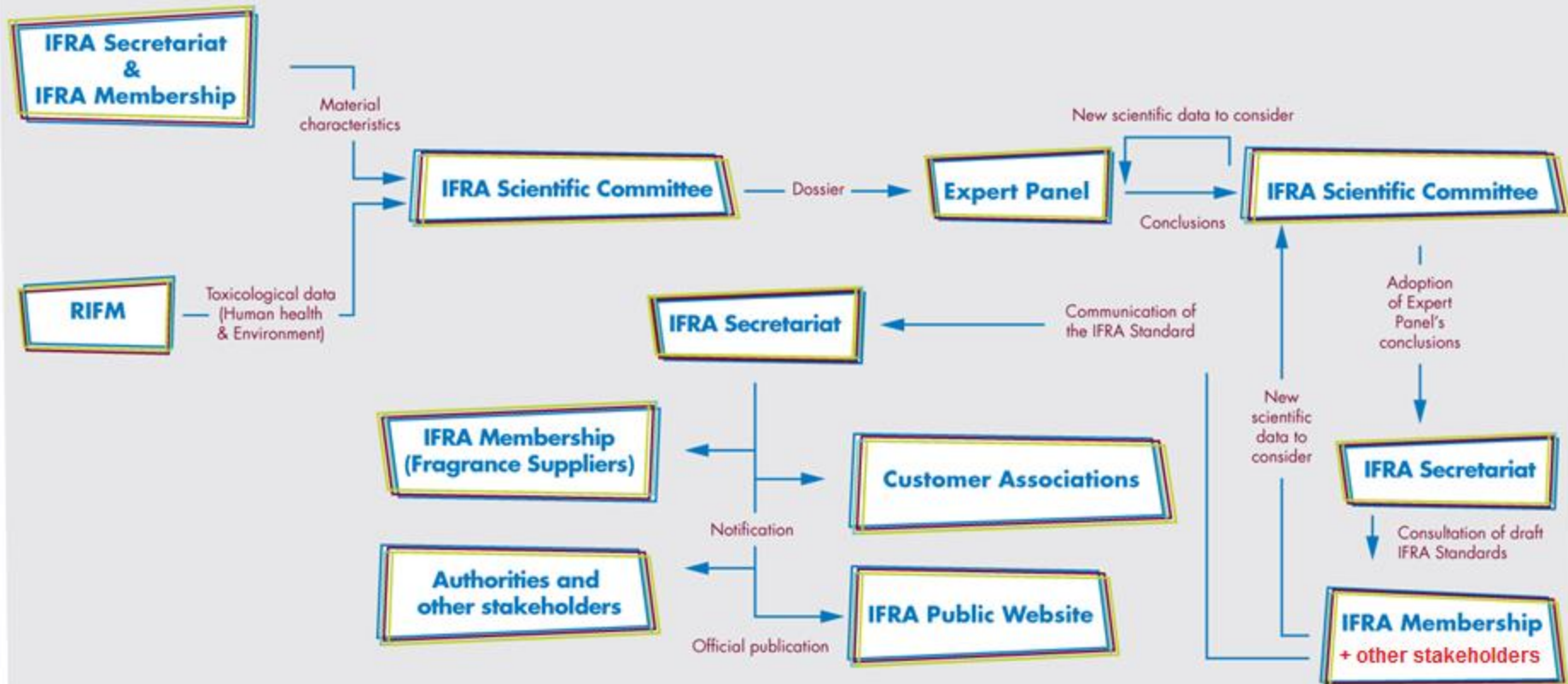
Recommendation from the workshop:

Better involve the dermatological community in the Standards development process and ensure the possibility to comment on proposed risk management measures (during the consultation of IFRA Standards). The dermatologist community should be involved as best as possible during the Consultation period taking place before each new IFRA Amendment, by e.g. regularly sharing the proposed new Standards with ESCD, ASCD, EADV and other relevant groups.

Action:

The dermatologist community will be included during the Consultation period of the IFRA Standards setting process

IFRA Standards Process



- The inclusion of dermatologists in the IFRA Standards Process is to allow additional stakeholder involvement. This proposal has been submitted to the ESCD and the ACDS already.
- The dermatologists would be consulted at the same time as the IFRA membership and other stakeholders like customer associations.

Risk Management

Only base IFRA Standards on science – dealing with the maximum pragmatic level



Recommendation:

*Address with the IFRA Scientific Committee (SC) the issue of the Maximum Pragmatic Level (MPL). **This approach should be revoked and only the true QRA levels should be reported in all IFRA Standards.***

The MPLs are defined as those “not exceeding the usual concentration of the whole fragrance compound in the finished product”. They were introduced to prevent confusion of users by permitting extremely high use levels, that in practice due to the low use levels of the whole fragrance will never be met.

Action:

The SC was consulted and agreed to revoke this approach and implement it at the time of introducing changes resulting from the revision work of the QRA methodology.

Form an IDEA Communication Task Force

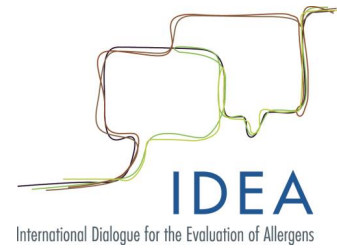


Recommendation:

*Set a working group to develop creative solutions in view to better inform the consumer on the presence of potential fragrance allergens in consumer products. **The existing communication procedure between the dermatologists and the industry will be extended to more countries and strengthened in view to improve the flow of information between practitioners and the fragrance houses when a fragrance compound is the suspected cause of a skin reaction.***

Dialogue with the Regulators & other trade associations

Dialogue with the regulators & other trade associations



Recommendation:

Continue the dialogue with the regulators and trade associations to explain that several markets (e.g. aromatherapy, OTC products) need to be better regulated.

Action:

- The IFRA Secretariat met the Association of the European Self-Medication Industry to “sensitize” them about the risk of fragrance allergens and how to use the QRA methodology. The first meeting took place on April 24th, 2013 and was followed by further exchanges with this association.

Dialogue with the regulators & other trade associations



Recommendation:

Continue the dialogue with the regulators and trade associations to explain that several markets (e.g. aromatherapy, OTC products) need to be better regulated.

Action:

- The IFRA Secretariat had several exchanges with the European Medical Agency to explain that fragrance ingredients can lead to induction of skin sensitization when used beyond their QRA maximum use level.
- The IFRA Secretariat will initiate a dialogue with DG SANCO B3 Unit to see how aromatherapy could be regulated.

Towards a revamped IFRA Compliance Program

IFRA Compliance Program



Recommendation:

*The compliance with IFRA Standards is important and **more efforts should be done by the fragrance industry to ensure that the market effectively complies with the IFRA Standards.***

Action:

- IFRA had a compliance program for several years that focused on the analysis of finished consumer products with regard to the presence of prohibited materials.
- IFRA is working with a consultant to develop a robust and meaningful compliance program. The work is ongoing.

IFRA Compliance Program



- IFRA is working with Eurofins on the analytical methods necessary to the extension of the compliance program to the control of QRA-restricted substances.
- A starting point for discussion is that problems of IFRA compliance might result from shortcomings in understanding / applying the IFRA Standards. Therefore it is discussed to have as one element of the IFRA compliance program a Capacity Building Program.
- The workshop participants will be consulted once the blueprint of this program is completed by the IFRA Secretariat (with the help of a consultant and its Scientific Committee).

IFRA Compliance Program



- One of the main features of the Capacity Building Program could be a software (already developed) to calculate the compliance of formulae with the requirements of IFRA Standards.
- This software will help companies with limited IT resources to make the complicated calculations necessary to verify the IFRA Standard compliance of fragrance formulae.



Thank you for your attention!

Dr. Matthias Vey
+32 (0)2 214 20 62
mvey@ifraorg.org

Dr. Fred Lebreux
+32 (0)2 214 20 61
flebreux@ifraorg.org

