

IFRA AND THE INDUSTRY SELF-REGULATION APPROACH

KEY POINTS

- Promotion of the self-regulatory and appropriate compliance practices of the industry in keeping with the idea that the adaptation of worldwide industry rules to new scientific findings can occur more quickly and efficiently through self-regulation as opposed to diverse legislation in different countries on different continents.
- IFRA's Standards and Code of Practice are binding on its members and are strictly adhered to by fragrance manufacturers
- IFRA's Standards have banned or restricted the use of about 150 substances which have been or are used in fragrance products.
- The industry has started the implementation of a compliance policy in 2005-2006 to verify that the IFRA Standards are respected in practice in the market place.

Background information

The fragrance industry formulates and supplies fragrances to consumer product manufacturers, particularly in the cosmetic and household cleaning product sectors. The industry established one of the earliest self-regulatory systems, over 30 years ago, aimed at ensuring the highest levels of safety of fragranced products.

The self-regulatory system was set up following the increased awareness in the 1960s that fragrances could cause skin allergies. At that time there were no regulatory frameworks to control fragrance usage in place. The industry decided responsibly to start work to determine which fragrance ingredients might be responsible for skin allergies, so that their use could be controlled. With this knowledge, an internationally applied system of control could be developed as a framework for self-regulation.

The adaptation of industry rules worldwide to new scientific findings can occur more quickly through self-regulation than a change of legislation in different countries on different continents.

The fragrance industry self-regulation approach

The International Fragrance Association (IFRA), created in 1973 to represent the fragrance creation industry worldwide, has as its main purpose assurance of the safety of fragrance materials through a dedicated science program.

Through a close collaboration with the Research Institute for Fragrance Materials, Inc. (RIFM), IFRA has developed a strong and effective base of scientific information. The focus of the IFRA's efforts in recent years has been to strengthen the science program further and increase awareness of the pro-active attitude of the fragrance industry with regard to safety.



Membership to the IFRA is open to all associations of all nationalities, and currently comprises the national or regional associations of fragrance manufacturers, spanning from Australia, Europe, the Far East and North and South America.

Since October 2007, companies active in the industry may as well become direct members of IFRA if meeting certain conditions.

IFRA's Code of Practice is binding on its members. It currently comprises more than 150 restrictions, called Standards, as well as guidance for proper evaluation of other materials and general principles of safe use. They reflect best practice of the industry and have – not only for our members – the same legal value as the other sources of law, such as legislation or regulator intervention. IFRA's Standards **ban or restrict** the use of fragrance ingredients or set special purity criteria on them. The IFRA Code of Practice and the IFRA Standards are available on the IFRA website (www.ifraorg.org).

New IFRA Standards and revision of existing IFRA Standards occur frequently in order to keep pace with information changes. New or revised Standards can be prompted in a number of different ways:

- The review by REXPAN (the independent expert panel of RIFM) of existing Standards or of substances, based on the criteria document published by RIFM in 2000
- New evidence on ingredients from tests carried out by RIFM
- New evidence on ingredients from manufacturers' reports
- New evidence on ingredients from tests carried out elsewhere

Once a review has been initiated, IFRA and RIFM compile dossiers that contain everything required by REXPAN to make their assessments, including proposals for a ban or restriction on use. IFRA Standards are then established on the basis of REXPAN assessments.

The IFRA believes that the promotion of the self-regulatory and appropriate compliance practices of the industry facilitates the adaptation of worldwide industry rules to new scientific findings and this adaptation occurs more quickly and efficiently through self-regulation as opposed to diverse legislation in different countries on different continents.

For IFRA members, sector practices have the same legal value as any of the other sources of law. Governments and their regulatory authorities have long recognised that legislation is usually not required on matters covered by generally recognised sector best practices, like the IFRA Standards. Their value and importance is shown by the fact that the European Cosmetics Industry Association asks for a certificate of IFRA compliance as part of the safety assessment for cosmetic products to satisfy the demands of the European Cosmetics Directive, the Brazilian policy makers have adopted into Law the IFRA Standards, and that the new South East Asia Pacific cosmetic directive to take effect on January 1, 2008 will explicitly refer to the IFRA Standards as far as fragrances in cosmetic products are concerned.

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