

Impact assessment study on fragrance allergens - cosmetic products

Fields marked with * are mandatory.

Introduction

Thank you for taking the time to respond to this public consultation on the **labelling of fragrance allergens on cosmetic products**. The public consultation is conducted as a part of an impact assessment study providing input for a possible new initiative on the labelling of fragrance allergens in cosmetic products, amending EC Regulation 1223/2009 (hereafter 'Cosmetics Regulation')[1]. For the inception impact assessment, please see the link below:

https://ec.europa.eu/growth/content/inception-impact-assessment-fragrance-allergens-labelling-published_en.

'Fragrances' are substances which are used for perfuming cosmetics (soaps, perfumes, creams, etc.) and other products. Some of the fragrances can cause allergic reactions that are called 'fragrance allergens'. According to Annex III (column 'Other') of the Cosmetics Regulation, currently 26 (soon 25 due to the ban of one substance - HICC)[2] fragrance allergens have to be individually labelled. Their presence has to be indicated in the list of ingredients if their concentration exceeds 0.001% in leave-on products and 0.01% in rinse-off products.

[The Opinion of 26-27 June 2012 of the Scientific Committee on Consumer Safety \(SCCS\)\[3\]](#),

recommended that the consumer is informed about additional fragrance allergens present in cosmetic products. The SCCS opinion covers only contact allergies (contact allergy is an allergy which may develop following skin contact with a sufficient amount of an allergen). Since the number of allergens to be listed would increase from the current 25 ingredients to 87[4], the labelling on the package could be more challenging particularly for smaller items. It is however very unlikely that one product would contain all 87 ingredients. The average number of allergens per product would be estimated at up to 10[5], compared to three on average in the present situation[6]. For this reason, the European Commission is currently considering different policy options for labelling, including:

- Option 1. Baseline: No changes to the current rules, i.e. no labelling of additional fragrance allergens
- Option 2. On-pack labelling: Labelling additional fragrance allergens according to the present rules of the Cosmetics Regulation, i.e. on the package of a cosmetic product or in other alternative ways (leaflets, tags, etc.).

- Option 3. Electronic labelling (e-labelling) as an option for the manufacturer, who could choose between on-pack and e-labelling. E-labelling could cover either all the fragrance allergens (87) or only the 62 new fragrance allergens (while the fragrance allergens which are currently labelled on-pack would remain to be so labelled). There are three sub-options of e-labelling:

o 3 a) E-labelling by displaying on the package of each cosmetic product a website address through which the consumer can access the list of ingredients.

o 3 b) E-labelling by displaying a QR code (a type of square barcode that can be scanned with an appropriate app on a smartphone with a built-in camera) on the package that, upon scanning, would give access to the list of fragrance allergens present in the cosmetic product. The consumer would need to have a QR reading application on a personal device such as a smart phone, unless one is provided at the point of sale.

o 3 c) E-labelling by displaying a barcode on the package that, upon scanning, would give access to the list of ingredients. The consumer would need to have a barcode reading application on a personal device, unless one is provided at the point of sale.

Sub-options a, b and c could be combined.

This questionnaire will take no longer than 15 minutes to complete. All answers and data provided will be processed and analysed respecting the EU data protection and privacy standards.

[1] Regulation (EC) No 1223/2009 of the European Parliament and of the Council of 30 November 2009 on cosmetic products, OJ L 342,22.12.2009, p. 59.

[2] One of the 26 allergens currently subject to labelling – HICC (3 and 4-(4-Hydroxy-4-methylpentyl) cyclohex-3-ene-1-carbaldehyde) has been excluded from these calculations as it was banned by Regulation 2017/1410 of 2 August 2017. Transition periods for the ban end on 23 August 2019 (for placing the substance on the market) and 23 August 2021 (for making it available on the market). The present study assumes the situation when HICC is no longer present on the market.

[3] http://ec.europa.eu/health/scientific_committees/consumer_safety/docs/sccs_o_102.pdf

[4] The number of substances to be labelled may change due to the possible grouping of some substances.

[5] Based on the feedback of the Danish Consumer Council on the Inception Impact Assessment (2018).

[6] Bennike, N. H., Bang Oturai, N., Müller, S., Sogaard Kirkeby, C., Jorgensen, C., Beck Christensen, A., Zachariae, C., & Duus Johansen, J. (2017). Fragrance contact allergens in 5,588 cosmetic products identified through a novel smartphone application.

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
-

- English
- Estonian
- Finnish
- French
- Gaelic
- German
- Greek
- Hungarian
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* First name

* Surname

* Email (this won't be published)

* Scope

- International

- Local
- National
- Regional

* Organisation name

255 character(s) maximum

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

* Country of origin

Please add your country of origin, or that of your organisation.

- | | | | |
|---|--|--|--|
| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> Samoa |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> San Marino |
| <input type="radio"/> Andorra | <input type="radio"/> El Salvador | <input type="radio"/> Madagascar | <input type="radio"/> São Tomé and Príncipe |
| <input type="radio"/> Angola | <input type="radio"/> Equatorial Guinea | <input type="radio"/> Malawi | <input type="radio"/> Saudi Arabia |
| <input type="radio"/> Anguilla | <input type="radio"/> Eritrea | <input type="radio"/> Malaysia | <input type="radio"/> Senegal |
| <input type="radio"/> Antarctica | <input type="radio"/> Estonia | <input type="radio"/> Maldives | <input type="radio"/> Serbia |
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| <input type="radio"/> Argentina | <input type="radio"/> Ethiopia | <input type="radio"/> Malta | <input type="radio"/> Sierra Leone |
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| <input type="radio"/> Aruba | <input type="radio"/> Faroe Islands | <input type="radio"/> Martinique | <input type="radio"/> Sint Maarten |
| <input type="radio"/> Australia | <input type="radio"/> Fiji | <input type="radio"/> Mauritania | <input type="radio"/> Slovakia |
| <input type="radio"/> Austria | <input type="radio"/> Finland | <input type="radio"/> Mauritius | <input type="radio"/> Slovenia |
| <input type="radio"/> Azerbaijan | <input type="radio"/> France | <input type="radio"/> Mayotte | <input type="radio"/> |

- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar /Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda

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| <input type="radio"/> Chile | <input type="radio"/> Isle of Man | <input type="radio"/> Panama | <input type="radio"/> Ukraine |
| <input type="radio"/> China | <input type="radio"/> Israel | <input type="radio"/> Papua New Guinea | <input type="radio"/> United Arab Emirates |
| <input type="radio"/> Christmas Island | <input type="radio"/> Italy | <input type="radio"/> Paraguay | <input type="radio"/> United Kingdom |
| <input type="radio"/> Clipperton | <input type="radio"/> Jamaica | <input type="radio"/> Peru | <input type="radio"/> United States |
| <input type="radio"/> Cocos (Keeling) Islands | <input type="radio"/> Japan | <input type="radio"/> Philippines | <input type="radio"/> United States Minor Outlying Islands |
| <input type="radio"/> Colombia | <input type="radio"/> Jersey | <input type="radio"/> Pitcairn Islands | <input type="radio"/> Uruguay |
| <input type="radio"/> Comoros | <input type="radio"/> Jordan | <input type="radio"/> Poland | <input type="radio"/> US Virgin Islands |
| <input type="radio"/> Congo | <input type="radio"/> Kazakhstan | <input type="radio"/> Portugal | <input type="radio"/> Uzbekistan |
| <input type="radio"/> Cook Islands | <input type="radio"/> Kenya | <input type="radio"/> Puerto Rico | <input type="radio"/> Vanuatu |
| <input type="radio"/> Costa Rica | <input type="radio"/> Kiribati | <input type="radio"/> Qatar | <input type="radio"/> Vatican City |
| <input type="radio"/> Côte d'Ivoire | <input type="radio"/> Kosovo | <input type="radio"/> Réunion | <input type="radio"/> Venezuela |
| <input type="radio"/> Croatia | <input type="radio"/> Kuwait | <input type="radio"/> Romania | <input type="radio"/> Vietnam |
| <input type="radio"/> Cuba | <input type="radio"/> Kyrgyzstan | <input type="radio"/> Russia | <input type="radio"/> Wallis and Futuna |
| <input type="radio"/> Curaçao | <input type="radio"/> Laos | <input type="radio"/> Rwanda | <input type="radio"/> Western Sahara |
| <input type="radio"/> Cyprus | <input type="radio"/> Latvia | <input type="radio"/> Saint Barthélemy | <input type="radio"/> Yemen |
| <input type="radio"/> Czechia | <input type="radio"/> Lebanon | <input type="radio"/> Saint Helena Ascension and Tristan da Cunha | <input type="radio"/> Zambia |
| <input type="radio"/> Democratic Republic of the Congo | <input type="radio"/> Lesotho | <input type="radio"/> Saint Kitts and Nevis | <input type="radio"/> Zimbabwe |
| <input type="radio"/> Denmark | <input type="radio"/> Liberia | <input type="radio"/> Saint Lucia | |

* Publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only your type of respondent, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

Public

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

I agree with the [personal data protection provisions](#)

* What is your position in the value chain?

- Production of raw materials
- Manufacture

- Wholesale
- Retail and beauty services
- Other (please specify)

Other, please specify

* In what sector does your company/business operate?

- Cosmetics
- Cosmetic toys
- Detergents
- Other (please specify)

* If other, please specify

300 character(s) maximum

* Are you a medical professional or health-related researcher?

- Yes
- No

Questions for consumers

* Do you have an allergy?

- Yes, a contact allergy (allergy which may develop following skin contact with a sufficient amount of an allergen)
- Yes, another type of allergy
- No, I do not have any allergies
- I do not know

* After using which category of products do you have contact allergy reactions?

- Cosmetic products
- Detergents (washing powders and liquids, washing-up liquids, softeners, etc.)
- Other products
- I do not know / I do not remember

* Do you consult a medical professional when you have symptoms of contact allergy?

- Yes, always
- Yes, sometimes
- No, I act on medical instructions I received before
- I have never consulted a medical professional for my contact allergy

* Do you know to which categories of substances you are allergic to?

- Perfuming substances (fragrance allergens)
- Other substances used in cosmetic products

I do not know

- * Do you know the name(s) of the fragrance allergen(s) to which you are allergic to?
- Yes, all
 - Some
 - No

An allergic reaction of the skin can cause different kinds of costs. Could you rank the following costs by order of importance from your perspective? (from 1=most important to 4=least important)

	1	2	3	4
* Direct medical costs (doctor fees, medical tests, prescribed medicines and prescribed cosmetic products, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Indirect costs (e.g. over-the-counter products chosen for their specific hypoallergenic and fragrance-free characteristics)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Loss of personal welfare (discomfort caused by the allergic reaction, loss of self-esteem, restrictions in social participation, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Productivity loss at work	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

- * Can you make an estimation of your annual direct medical costs (doctor fees, hospital visits, etc.) per year? Please include all costs, whether paid by yourself or by your insurance company.
- 0-50 EUR
 - 51-100 EUR
 - 101-200 EUR
 - 201-500 EUR
 - >500 EUR
 - I do not know / I do not remember
- * Can you make an estimation of your indirect costs (e.g. over-the-counter products chosen for their specific hypoallergenic and fragrance-free characteristics) per year?
- 0-50 EUR
 - 51-100 EUR
 - 101-200 EUR
 - 201-500 EUR
 - >500 EUR
 - I do not know / I do not remember
- * How much does your skin allergy affect your quality of life?
- Not at all
 - A little
 - To some extent
 - Very much

* How many days of sick leave did you have to take due to skin allergy in the past 12 months?

- None
- 1-5 days a year
- 6-10 days a year
- >10 days a year
- I do not know / I do not remember

* How many days did you work while you were not fit due to skin allergy (or medication for it) in the past 12 months?

- None
- 1-5 days a year
- 6-10 days a year
- >10 days a year
- I do not know / I do not remember

* Before purchasing a cosmetic product, how often do you check the list of product ingredients?

- Every time
- Almost every time
- Almost never
- Never
- I do not know

* In general, where do you look for information on whether a product contains any of the allergen(s) you are allergic to?

- The packaging of the product
- Manufacturer website
- I ask the store staff
- I ask my doctor
- I ask my cosmetologist/hairdresser/other personal care professional
- Website providing assistance to people with allergies
- I have an app on my phone that helps me to identify the ingredients in cosmetic products
- Media articles
- I do not look for this information at all
- Other, please specify

* If other, please specify

300 character(s) maximum

* When do you usually look for information on the allergens contained in a specific product?

- Before purchase by self-information (e.g. manufacturer website, media)
-

Before purchase by asking a third party (e.g. doctor, personal care professional, etc.)

- During purchase by self-information (e.g. reading the packaging)
- During purchase by asking a third party (e.g. retailer)
- After purchase by self-information (e.g. reading the packaging, online, media)
- After purchase by asking a third party (e.g. doctor, manufacturer, etc.)
- I do not look for information / I do not know

Could you rank the following strategies to avoid exposure to fragrance allergens by order of importance from your perspective? (from 1=most important to 4=least important)

	1	2	3	4
* Avoid using cosmetic products with fragrance ingredients in general	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Only buy cosmetic products that I have used before and did not give me an allergic reaction	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Only buy cosmetic products recommended by medical or personal care specialists	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Only buy cosmetic products after carefully checking myself the list of ingredients	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other, please specify	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* If other, please specify

300 character(s) maximum

* When you shop for cosmetic products you normally have with you:

- A smartphone
- A tablet
- Both of them
- None of them

* Do you have access to internet; Wi-Fi or 4G while shopping for cosmetics (e.g. via smartphone or tablet or via other tools provided in the shop)?

- Yes, always or usually
- Sometimes
- Rarely or never

* On your device, such as smartphone or tablet, you have:

- A QR code reader app
- A barcode scanning app
- Both of them
- None of them
- I do not have a smartphone or tablet

- * How important to you is the appearance of the package when choosing what cosmetic products to buy?
 - Very important
 - Somewhat important
 - Not very important
 - Not important at all
 - I do not know / no opinion

- * Is it currently easy or difficult to read the list of ingredients on the cosmetic product (including tags, leaflets, etc.)?
 - Very easy
 - Easy
 - Neither easy nor difficult
 - Difficult
 - Very difficult
 - I do not know / no opinion

How would you prefer the ingredients to be labelled, if the list of ingredients would get longer due to obligation of labelling additional fragrance allergens? On average, 7 (fragrance allergens) would be added to the list of ingredients. On one cosmetic product on average up to 10 fragrance allergens would need to be labelled.[1]

[1] Based on the estimation that one cosmetics product contains on average 3 fragrance allergens already labelled (see Bennike, N. H., Bang Oturai, N., Müller, S., Sogaard Kirkeby, C., Jorgensen, C., Beck Christensen, A., Zachariae, C., & Duus Johansen, J. (2017). Fragrance contact allergens in 5,588 cosmetic products identified through a novel smartphone application) and that considering the longer list of fragrance allergens, up to 10 in total are contained in one product on average (see feedback of the Danish Consumer Council on the Inception Impact Assessment (2018)).

	Strong preference	Moderate preference	No preference	I do not know / no opinion
* On the package, attached leaflets, tag or similar	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* E-labelled (through a QR code, barcode, internet address)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Not to be labelled at all	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If e-labelling were to be used, please put the different options into order of preference (please note that you would have to possess the connected device, and in case of QR codes and barcodes the appropriate app to access the information):

	First preference	Second preference	Third preference	I do not know / No opinion
* Website address on package	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* QR code on package	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Barcode on package



If e-labelling were to be used, in your opinion which would be the best way to provide information on the list of fragrance allergens to persons without internet access?

	Strong preference	Moderate preference	No preference	I do not know / no opinion
In stores through separate leaflets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* In stores through screens	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* With free of charge calls	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* With free of charge return text messages	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* If other, please specify

300 character(s) maximum

In your opinion, what would be the impact of the following labelling options on the prevention of allergic disease symptoms?

	Greatly facilitate prevention	Facilitate prevention to some extent	No impact on prevention	Complicate prevention to some extent	Greatly complicate prevention	Do not know / no opinion
* On-pack labelling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* E-labelling (with website address, QR code, barcode)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Questions for medical professionals and researchers in the health sector (including academic/research institutions)

Allergic contact dermatitis is causing different socio-economic costs. Could you rank the costs by order of importance from your experience? (1=most important to 4=least important)

	1	2	3	4
* Direct medical costs (doctor fees, hospital visits, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Indirect costs (e.g. over-the-counter products chosen for their specific hypoallergenic and fragrance-free characteristics)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Loss of personal welfare (self-esteem, restrictions in social participation, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Productivity loss at work	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

- * Can you make an estimation of the annual direct medical costs (doctor fees, hospital visits, etc.) of one person allergic to fragrance allergens per year? Please include all costs, whether paid by the patient or by his/her insurance company.
 - 0-50 EUR
 - 51-100 EUR
 - 101-200 EUR
 - 201-500 EUR
 - >500 EUR
 - I do not know

- * Can you make an estimation of the indirect costs (e.g. over-the-counter products chosen for their specific hypoallergenic and fragrance-free characteristics) of one person allergic to fragrance allergens per year?
 - 0-50 EUR
 - 51-100 EUR
 - 101-200 EUR
 - 201-500 EUR
 - >500 EUR
 - I do not know

- * How many days of sick leave would a person allergic to fragrance allergens take on average over 12 months due to skin allergy?
 - None
 - 1-5 days a year
 - 6-10 days a year
 - >10 days a year
 - I do not know

- * How often are you asked by patients to provide information about contact allergens in cosmetic products?

- Always
- Often
- Occasionally
- Rarely
- Never
- I do not know / I do not diagnose allergies

* Have patients been complaining to you about the lack of information on contact allergens when it comes to cosmetics?

- Yes, often
- Yes, sometimes
- No, never
- I do not know / I do not diagnose allergies

* How often do you rely on the lists of ingredients of cosmetic products used by a patient to help you identify a potential allergen?

- Always
- Often
- Occasionally
- Rarely
- Never
- I do not know / I do not diagnose allergies

* What diagnostic tools do you use / prescribe to identify contact allergy?

[1] Mix I: Amyl cinnamal (alpha-amyl cinnamal), Cinnamyl alcohol (cinnamic alcohol), Cinnamal (cinnamic aldehyde), Eugenol, Geraniol, Hydroxycitronellal, Isoeugenol, Oak moss absolute (a natural extract; INCI: Evernia prunastri), Sorbitan sesquioleate (added as an emulsifier).

Mix II: Citronellol, Citral, Coumarin, Hydroxyisohexyl 3-cyclohexene carboxaldehyde (HICC), Farnesol, Alpha-hexyl-cinnamal. See Scientific Committee on Consumer Safety (SCCS). 2012. Opinion on fragrance allergens in cosmetics. SCCS 1459/11

- Patch test - Mixes I and II [1]
- Patch test - Testing substances other than Mixes I and II
- Other diagnostic tools (please specify)
- I do not know / I do not diagnose allergies

* If other diagnostic tools, please specify

300 character(s) maximum

* Do you believe that labelling of additional fragrance allergens will help with diagnosis of allergies?

- Yes, significantly
- Yes, to some extent
- No
- I do not know / no opinion

Based on your experience, how would you assess the ability of allergic consumers to inform themselves, should information on additional allergens be provided in the

following way? On average, 7 ingredients would be added to the list of ingredients if additional 62 fragrance allergens have to be labelled. On one cosmetic product there would be on average 10 fragrance allergens ('current' and 'new') labelled.[1]

[1] Based on the estimation that one cosmetics product contains on average 3 fragrance allergens already labelled (see Bennike, N. H., Bang Oturai, N., Müller, S., Sogaard Kirkeby, C., Jorgensen, C., Beck Christensen, A., Zachariae, C., & Duus Johansen, J. (2017). Fragrance contact allergens in 5,588 cosmetic products identified through a novel smartphone application) and that considering the longer list of fragrance allergens, up to 10 in total are contained in one product on average (see feedback of the Danish Consumer Council on the Inception Impact Assessment (2018)).

	Not able at all to inform themselves	Not able to inform themselves	Able to inform themselves to some extent	Fully able to inform themselves	I do not know / no opinion
* No changes to the current rules (on-pack labelling of 25 allergens)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* On-pack labelling of current and new allergens (in total 87 allergens)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* On-pack labelling of current 25 allergens and e-labelling of 62 new allergens	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* E-labelling of current and new allergens	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

In your opinion, what would be the impact of different labelling options on the diagnosis of contact allergy?

	Greatly facilitate diagnosis	Facilitate diagnosis to some extent	No impact on diagnosis	Complicate diagnosis to some extent	Greatly complicate diagnosis	I do not know / no opinion
* On-pack labelling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* E-labelling (with website address, QR code, barcode)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Do you expect that labelling additional fragrance allergens would trigger the development of new patch tests for those additional allergens?

- Yes, definitely
- Maybe
- No
- I do not know

* Please explain your answer.

1000 character(s) maximum

Questions for companies and business associations

On average, 7 ingredients would be added to the list of ingredients if additional 62 fragrance allergens have to be labelled. On one cosmetic product there would be on average 10 fragrance allergens ('current' and 'new') labelled.[1] For the products you manufacture/sell/represent, would you prefer the information of the fragrance allergens to be provided in:

[1] Based on the estimation that one cosmetics product contains on average 3 fragrance allergens already labelled (see Bennike, N. H., Bang Oturai, N., Müller, S., Sogaard Kirkeby, C., Jorgensen, C., Beck Christensen, A., Zachariae, C., & Duus Johansen, J. (2017). Fragrance contact allergens in 5,588 cosmetic products identified through a novel smartphone application (and that considering the longer list of fragrance allergens, up to 10 in total are contained in one product on average (see feedback of the Danish Consumer Council on the Inception Impact Assessment (2018)).

	Strong preference	Moderate preference	No preference	I do not know / no opinion
* An on-pack label for current and new fragrance allergens (up to 87)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* An on-pack label for the current 25 fragrance allergens, an e-label for the 62 new fragrance allergens	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* An e-label for current and new fragrance allergens	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* If other, please specify

300 character(s) maximum

If e-labelling was used, would you prefer the information of the fragrance allergens to be provided via:

	Strong preference	Moderate preference	No preference	I do not know / no opinion
* Website address	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* QR code	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Barcode	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Combination of options (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

*** If a combination of options, please specify**

300 character(s) maximum

*** If other, please specify**

300 character(s) maximum

*** If e-labelling was used, in your opinion which would be the best way to provide alternative access to the information on fragrance allergens for consumers without internet access?**

- With free of charge calls
- With return text messages
- Through in-store leaflets or screens
- Other (please specify)

*** If other, please specify**

300 character(s) maximum

What would be the impact of the following one-off costs on your total operating costs[2] assuming the transitional period of two years for placing compliant products on the market and three-year transitional period for withdrawing?

[2] The total operating costs for a company include the cost of goods sold (e.g. material, labour), operating expenses (e.g. salary, rent) as well as overhead expenses.

	No increase (business as usual)	Increase of 0-3%	Increase of 3-5%	Increase of 5-8%	Increase of >8%	I do not know / it does not concern me
<p>* One-off costs for on-pack and e-labelling: Cost of developing / acquiring new analytical methods for identification and quantification of additional fragrance allergens in the cosmetic products</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>* One-off costs for on-pack and e-labelling: Cost of withdrawing non-compliant packages from the market</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>* One-off costs for on-pack and e-labelling: Costs relating to re-</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

designing of a package to shorten the list for exported goods						
* One-off costs for on-pack labelling: Costs relating to re-designing of a package to add new allergens to the list of ingredients	<input type="radio"/>					
* One-off costs for e-labelling: Costs relating to re-designing of a package to add a website address/QR code/barcode	<input type="radio"/>					
* One-off costs for e-labelling: Cost of creating a publicly accessible database with lists of allergens of cosmetic products for the purpose of labelling	<input type="radio"/>					
* One-off costs for e-labelling: Costs of providing information through in-store leaflets /screens	<input type="radio"/>					
* One-off costs for e-labelling: Staff training costs	<input type="radio"/>					

Other one-off costs
(please specify)



* If other one-off costs, please explain what these costs would be

1500 character(s) maximum

What would be the impact of the following recurring costs on your total operating costs (on the basis of one-year costs)?

	Decrease of >3%	Decrease of 0-3%	No impact (business as usual)	Increase of 0-3%	Increase of >3%	I do not know / it does not concern me
Recurring costs for e-labelling: Costs of maintaining a publicly accessible database with lists of allergens of cosmetic products for the purpose of labelling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Recurring costs for e-labelling: Cost of providing access to allergen information for consumers without internet access by the manufacturer via free-of-charge calls	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Recurring costs for e-labelling: cost of providing access to allergen information for consumers without	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

internet access by the manufacturer via return text messages						
Recurring costs for e-labelling: Staff training costs	<input type="radio"/>					
Other recurring costs (please specify)	<input type="radio"/>					

* If other recurring costs, please explain what these costs would be

1500 character(s) maximum

* Do you expect that the obligation of labelling additional fragrance allergens would result in the change of formulas of the cosmetic products (for example the number of fragrance allergens used or their concentrations)?

- Yes
- No, formulas will not change
- I do not know / no opinion

To what extent do you expect the policy options to affect the attractiveness of the package, compared to the present situation (up to 25 fragrance allergens labelled on pack)?[3]

[3] Based on the estimation that one cosmetics product contains on average 3 fragrance allergens already labelled (see Bennike, N. H., Bang Oturai, N., Müller, S., Sogaard Kirkeby, C., Jorgensen, C., Beck Christensen, A., Zachariae, C., & Duus Johansen, J. (2017). Fragrance contact allergens in 5,588 cosmetic products identified through a novel smartphone application (and that considering the longer list of fragrance allergens, up to 10 in total are contained in one product on average (see feedback of the Danish Consumer Council on the Inception Impact Assessment (2018)).

	Decreases significantly	Decreases somewhat	No impact	Increases somewhat	Increases significantly	I do not know / no opinion
* On-pack labelling (of up to 87 fragrance allergens)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* E-labelling with website address	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* E-labelling with QR code	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* E-labelling with barcode	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

To what extent do you expect the policy options to affect the transparency of information?

	Decreases significantly	Decreases somewhat	No impact	Increases somewhat	Increases significantly	I do not know / no opinion
* No changes to the current rules (on pack labelling of 25 fragrance allergens)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* On-pack labelling (of up to 87 fragrance allergens)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* E-labelling with website address	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* E-labelling with a QR code	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* E-labelling with a barcode	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

To what extent do you expect the policy options to affect the current trust of consumers in the product?

	Decreases significantly	Decreases somewhat	No impact	Increases somewhat	Increases significantly	I do not know / no opinion
* No changes to the current rules (on pack labelling of 25 fragrance allergens)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* On-pack labelling (of up to 87 fragrance allergens)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* E-labelling with website address	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* E-labelling with a QR code	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* E-labelling with a barcode	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

What would be the environmental impact of each option, assuming a two-year transitional period for placing compliant products on the market and a three-year transitional period for withdrawing products from the market?

	Significant negative impact	Moderate negative impact	No impact	Moderate positive impact	Significant positive impact	I do not know / No opinion
* On-pack labelling of additional fragrance allergens (e.g. waste produced by withdrawal of packages, size of packages, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* E-labelling options (e.g. waste produced by withdrawal of packages, leaflets for customers without internet, data storage, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Questions for public authorities

Allergic contact dermatitis to fragrance allergens can cause different costs. Could you rank the following costs by order of importance from your perspective?

(1=most important to 4=least important)

	1	2	3	4
* Direct medical costs (doctor fees, medical tests, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Indirect costs including fragrance free products (e.g. over-the-counter products chosen for their specific hypoallergenic and fragrance-free characteristics)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Loss of personal welfare (self-esteem, restrictions in social participation, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Productivity loss at work	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Can you make an estimation of the annual direct medical costs (doctor fees, hospital visits, etc.) of one person allergic to fragrance allergens per year? Please include all costs, whether paid by the patient or by his/her insurance company.

- 0-50 EUR
- 51-100 EUR
- 101-200 EUR
- 201-500 EUR
- >500 EUR
- I do not know

* Can you make an estimation of the indirect costs (e.g. over-the-counter products chosen for their specific hypoallergenic and fragrance-free characteristics) of one person allergic to fragrance allergens per year?

- 0-50 EUR
- 51-100 EUR
- 101-200 EUR
- 201-500 EUR
- >500 EUR
- I do not know

* How many days of sick leave would a person allergic to fragrance allergens take on average over 12 months due to skin allergy?

- None
- 1-5 days a year
- 6-10 days a year
- >10 days a year
- I do not know

Based on your experience, how would you assess consumer ability to inform themselves, should the information on additional allergens be provided in the following way?

	Not able at all to inform themselves	Not able to inform themselves	Able to inform themselves to some extent	Fully able to inform themselves	I do not know / no opinion
* No changes to the current rules (on pack labelling of 25 fragrance allergens)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* On-pack labelling of current and new allergens (in total up to 87 allergens)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* On-pack labelling of current 25 allergens and e-labelling of 62 new allergens	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* E-labelling of current and new allergens	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If the e-labelling option was implemented, how would you assess consumer ability to inform themselves?

	Not able at all to inform themselves	Not able to inform themselves	Able to inform themselves to some extent	Fully able to inform themselves	I do not know / no opinion

* E-labelling with website address	<input type="radio"/>				
E-labelling with a QR code	<input type="radio"/>				
* E-labelling with a barcode	<input type="radio"/>				

If the e-labelling option was implemented, which alternative ways to provide information on the list of fragrance allergens to persons without internet access would you prefer?

[1] Please note that this option may require that the obligation be on the retailer.

[2] See above.

	Strong preference	Moderate preference	No preference	I do not know / no opinion
* In stores through leaflets[1]	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* In stores through screens[2]	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* With free of charge calls	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* With return text messages	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* If other, please specify

300 character(s) maximum

How would each labelling option of additional fragrance allergens affect the costs of enforcement?

	Decrease of >3%	Decrease of 0-3%	No impact on costs	Increase of 0-3%	Increase of >3%	I do not know / no opinion
* On-pack labelling	<input type="radio"/>					
* E-labelling with website address	<input type="radio"/>					
* E-labelling with a QR code	<input type="radio"/>					

* E-labelling with a barcode	<input type="radio"/>					
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Question for other respondents

Based on your experience, how would you assess consumer ability to inform themselves, should the information on additional allergens be provided in the following way?

	Not able at all to inform themselves	Not able to inform themselves	Able to inform themselves to some extent	Fully able to inform themselves	I do not know / no opinion
* No changes to the current rules (on pack labelling of 25 fragrance allergens)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* On-pack labelling of current and new allergens (in total up to 87 allergens)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* On-pack labelling of current 25 allergens and e-labelling of 62 new allergens	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* E-labelling of current and new allergens	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If the e-labelling option was implemented, how would you assess consumer ability to inform themselves?

	Not able at all to inform themselves	Not able to inform themselves	Able to inform themselves to some extent	Fully able to inform themselves	I do not know / no opinion
* E-labelling with website address	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* E-labelling with a QR code	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* E-labelling with a barcode	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If the e-labelling option was implemented, which alternative ways to provide information on the list of fragrance allergens to persons without internet access would you prefer?

	Strong preference	Moderate preference	No preference	I do not know / no opinion
* In stores through leaflets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* In stores through screens	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* With free of charge calls	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* With return text messages	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* If other, please specify

300 character(s) maximum

Closing questions

Please share any additional comments or remarks you may have regarding the topic of this public consultation.

3000 character(s) maximum

* Would you like to participate in a phone interview to further discuss the topics of the study? If yes, we would contact you via the email address provided in the beginning of the survey.

- Yes
- No