

Member Associations
Members of IFRA Committees
cc RIFM
Members of the JAG
Downstream User Associations

10 June 2025

Information Letter 1207

Subject: CALL FOR INTEREST – 7-hydroxycitronellal consortium formation

Related ILs: none

Dear Colleagues,

We would like to inform you that IFRA is facilitating the formation of a consortium to prepare a SCCS dossier for 7-hydroxycitronellal (HCA) (CAS no: 107-75-5) and that we would like to receive your interest in participating by 10 July 2025 the latest. Please see below the background and details.

Background

Article 15 of the EU Cosmetic Products Regulation¹ (CPR) lays down that substances which have been classified as carcinogenic, mutagenic, or toxic for the reproduction (CMR) listed on Annex VI to the CLP Regulation² shall be prohibited for use in cosmetic products, unless an exemption has been granted by the EU Commission (COM).

The exemption can be possibly granted only when industry has applied for an exemption and where the criteria for an exemption (Article 15(1) or (2) of the CPR) are fulfilled. This application includes the preparation of a safety dossier to be submitted to the European Commission and a positive assessment on the safe use by the Scientific Committee on Consumer Safety (SCCS) for CMRs category 2.

In December 2024, a CLH³ dossier proposing a classification of HCA as toxic for reproduction category 2 (Repr. 2/ H361d) was submitted by The Netherlands⁴ and the public consultation can start at any time now. In consequence, an SCCS dossier will need to be prepared to proof the safe use of this ingredient in cosmetics under the CPR.

The Commission estimates that industry must submit the SCCS dossier no later than six months after the ECHA RAC Opinion is published on the ECHA website, which is expected at the earliest next year.

Consortium formation

Several IFRA members have expressed interest in beginning preparations for forming a consortium to develop the SCCS dossier for HCA and IFRA is facilitating this exercise. Below is an estimation of the

¹ Regulation (EC) N° 1223/2009

² Regulation (EC) 1272/2008 on Classification, Labelling and Packaging of chemical substances and mixtures.

³ Harmonized Classification and Labelling

⁴ <https://echa.europa.eu/registry-of-clh-intentions-until-outcome/-/dislist/details/0b0236e18a9d0078>

costs based on current experience.

- SCCS dossier preparation: 50,000 – 60,000 EUR
- Admin costs (project management): 52,000 – 60,000 EUR.

Please note that the Consortium will be fully self-financed, and IFRA will not make any financial contribution. Therefore, this cost will be split between the members of the Consortium.

You will find as attachment 1 the IFRA Consortium Protocol which includes all the related activities and as attachment 2 the IFRA Consortium Agreement Template. The consortium members will sign the latter.

We would like to invite expressions of interest from members who are willing to join the consortium for the preparation of the SCCS dossier.

Please send your feedback to Cristina Arregui (carregui@ifrafragrance.org) by **10 July 2025**.
Thank you very much.

Best regards,
IFRA