

Umeå and Göteborg, 2012-02-14

Regarding: **SCCS Opinion on Fragrance Allergens in Cosmetic Products of December 13-14 2011**. This answer is on behalf of the Swedish Contact Dermatitis Group. The text below address the questions submitted. Berndt Stenberg and Johanna Bråred Christensson are both members of the Swedish Contact Dermatitis Group.

*QUESTION 1: Regarding fragrance ingredients that the consumer needs to be made aware of when present in cosmetic products.*

We agree that there is much evidence from clinical and experimental data which support that many more fragrance substances than those identified in the SCCNFP opinion of 1999 are sensitizers in humans. Ingredient listing is important for the management of patients who have contact allergy to one or more of the identified fragrance chemicals. It is also important for the patients to enable them to avoid future exposure to fragrance contact allergens for which they are sensitized. It is an important step to include substances known to be transformed to contact allergens by air oxidation or metabolism, and to treat these as equivalent to known contact allergens. The extension of the number of chemicals to be labeled and limited by the current opinion will most likely benefit consumers with regard to contact allergy.

*QUESTION 2: Can the SCCS establish any threshold for their safe use based on the available scientific data?*

This is a difficult question to answer as many fragrance chemicals have not been studied in a systematic way. However, the document identifies important topics and gives an overview of methods for further experimental and clinical research in the area. Available dose elicitation studies have indicated that a general level of exposure of up to 0.01%, 100 ppm is expected to be tolerated by most consumers with contact allergy to fragrance substances. This is an important step to limit expressions of contact eczema and, not least to prevent further sensitization of consumers. We also support the suggestion that the use of HICC, chloroatranol and atranol should not be used in consumer products.

*QUESTION 3: Regarding identification of substances where processes (e.g. metabolism, oxidation and hydrolysis) may lead to cross-reactivity and new relevant allergens.*

It is important to increase our knowledge of fragrance substances which form sensitizing compounds by air oxidation or by metabolic transformation. These substances may be assessed as less harmful than they are if the transformation is not considered. We appreciate that the use of antioxidants is commented, as preservatives have shown to be problematic in themselves as contact allergens. Much has yet to be done and, as stated in the opinion, the examples presented of pre- and prohaptens, are based on current knowledge and should be seen as indicative and illustrative of a general problem. Further research is important to widen the scope on oxidation, metabolic activation and cross reactivity in contact allergy.

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