

Perfumers and the 40th IFRA Amendement by Tony Burfield.

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Note: 28th March 2010. This article was felt to be worth retrieving from the archives, as it points out the decline in status and importance of the professional perfumer in the new millenium. It also marks the point (commencing with the 40th IFRA Amendment) at which the infamous & overly bureucratic QRA system changed the act of perfume design from a stand-alone interlectual activity, to a software-based procedure (where ingredients are fed in to a formula and the machinery advises individual ingredient levels allowable for a given fragranced application). Three years on from writing this article, the decline in the professional perfumer's status is even more obvious. It is hard for many of us who have been in the trade more than thirty years to consider many of today's young perfumers as true artists, but rather manipulators of computerised formulae, constantly tinkering in order to cope with the frequently revised hazard & risk classifications, shortages and eliminations of established fragrance ingredients. TB.

A Perfumers Lot.

You could be forgiven for thinking that perfumers are becoming a threatened species. Opportunities for working perfumers are disappearing as dinosaur eats dinosaur in the fragrance world, and small perfume companies fight to hold their places amongst a background of commercial takeovers and mergers.

Something else is happening too. In living memory, distinguished perfumers once led fragrance companies, or were, at least, members of the company's board. Now, salespeople, marketeers and accountants invariably head up aroma companies, and these very same individuals also seem to populate perfumery societies & associations, leaving the perfumers relegated as the 'back-room boys' of the trade, with a pecking order status slightly under the regulatory affairs manager, or the perfume evaluator.

Not only that, but perfumers, as the once-outspoken artistes of the aroma trade, have now been transformed to subordinate drones. Speaking out nowadays can cost your job, and job security in today's perfumery trade is not in good shape. If you are a perfumer working in Europe, EFFA's storm-troopers will probably have already impressed on your professional society or trade association – perhaps even via a personal visit - that your company must obey the EFFA Code of Practice (CoP) to the letter*. It will have also been impressed on your association that talking to the media is best left to EFFA 'experts' (following some allegedly unhelpful remarks made to the media by perfume company officials over synthetic musks, a few years previously). If you are a perfumer belonging to a trans-international company, your company will be distinctly aware of IFRA's naming and shaming policy for transgressing members who market perfumes not in compliance with IFRA's Standards.

** **Update 2010** – As of late 2009, EFFA's fragrance ingredient involvement is no more, supplanted now by IFRA's CoP which must be obeyed to the letter by IFRA members and IFRA member societies. . .*

The perfumers' workload of weekly customer briefs nowadays invariably contains requests for natural and sometimes even organic perfumes. The reality is, that there is no way that natural perfumes can be sold legally without labeling, or by going against IFRA Standards, and we have to face the fact that we are now firmly in the age of the synthetic perfume. This latter fact is such a truism that many senior perfumers have pointed out that this present generation of emerging perfumers are so unfamiliar with natural ingredients, that they are unable (through lack of training & familiarity) to craft 100% high-art natural perfumes.

The Pressure Builds.

The pressure on perfumers has been building for many years. Time allowed to complete customer briefs in recent years has become drastically reduced, from a once-luxurious 2-3 weeks to a mere few days, largely due to tighter working regimes imposed by powerful supermarket buyers. Progressive health & safety regulation (IFRA, CHIP etc), and the differing regulatory requirements of different nation states have compounded the difficulties. The real pressure however came with the introduction of the notorious (and some would still argue, largely unnecessary) 26 allergens legislation, initially in the form of the SCCNFP (2002) list, later to become enshrined as the 2003/15/EC Directive. The perfume market responded by requiring the reformulation of most existing perfumes, and the generation of a new company perfume 'shelf' (i.e. offered range) with either a zero, or a severely reduced, allergens content. This often meant eliminating or severely reducing the natural's content of perfumes (since 16 of these alleged allergens were present in natural products). This move which had disastrous consequences for perfume creation quality - and perfume buyers quickly realized that if they wanted perfumes that didn't actually smell like drain-cleaner from Mars, they needed to allow back a certain number of these allegedly allergenic ingredients. As a result of this flawed & highly unpopular regulatory approach, annual natural ingredient volumes used in perfumes dropped, the market became destabilized, and many ingredient & fragrance companies foundered with resulting job losses. Let's be quite clear about this: the bitterness against the regulatory authorities generated during this period, as decent honest working people lost their jobs as a result of the effects of this pointless piece of legislation will not be quickly forgotten by many in the trade.

Two years later, came the equally ill-thought out SCCP Opinion on Furanocoumarins (FCF's), SCCP/0942/05. Here a proposal to limit FCF's to 1ppm in the finished cosmetics promoted a quiet (we're not doing that) type of revolution amongst cosmetic companies. Sensible regulatory decisions have to be based on the art of the possible – and perfume construction was approaching near-impossibility with this additional burden. Further it was beginning to dawn on people that the need for more and more precautionary-principle based cosmetic regulations were questionable, when end-user adverse toxicological effects, as

reported for finished fragrances purchases, were below the 1 event per million sales mark anyway. Not only this, but why is it that the aroma trade is not entitled to a proper in depth risk/benefit analysis of aroma ingredients, instead of a mere risk analysis? The truth is probably that the skills of REXPAN/RIFM/SCCP etc do not encompass enough cross-disciplines to enable a risk/benefit analysis to be carried out, unlike the situation in all other professions.

To resume the plot (!), just as it seemed things were bad enough, with many other examples of regulatory shambles' from a Brussels cosmetic bureaucracy which is clearly not 'fit for purpose', along comes IFRA's 40th Amendment. This introduced the QRA approach for perfumery – with no consultation, no dialogue, no assessment of industry's capability of being able to carry it out:: just an order to do it or we will penalize you! This event was the straw that broke the camel's back; red-tape had pretty well strangled the aroma industry already, and yet here was the most involved pieces of technical bureaucracy yet devised – 82 categories of fragrance use under 11 major headings, requiring virtually every ingredient used in a fragrance to have multiple calculations associated with its proposed incorporation in its various applications. In fact, the art of perfumery could now be declared dead at this point, to be replaced by an expensive piece of computer software. If your business cannot afford the necessary programs to cope with this draconian legislation; you are out of the game. Of course the big aroma corporates are busy rubbing their hands with anticipation and glee – only they have the economic resources to cope with this hyper bureaucratic development. And it won't have escaped your notice that toxicologists from the big corporates carried out the toxicological research in the first place, which is said to justify the QRA scheme. However, I repeat, nobody has been allowed to challenge the scientific basis of the work, or its effects on industry – especially with regard to its discriminatory nature towards small companies.

The Damn Bursts.

Cropwatch announced a Boycott of the 40th IFRA Amendment, putting out its argument out at <http://www.cropwatch.org/newslet3.htm>. IFRA responded with an [anonymously written press statement](#) dated 19th Jan 2007 on its website. This IFRA press release was curious, in Cropwatch's opinion, since the regulatory authorities, & trade & professional associations had done their level best up to that point, to completely ignore Cropwatch's involved technical arguments (although, ironically, many of the rank and file members of these organizations now anonymously subscribe to Cropwatch). The IFRA press release gave Cropwatch an enormous publicity boost, and Cropwatch increased the pressure by starting a [petition against the Amendment](#) which has currently has amassed more than 700 signatures. A Cropwatch vs IFRA poll was held by *Perfumer & Flavorist* on their [website](#) which resulted in a landslide for Cropwatch (85.1% of votes in favour). However *P & F* have subsequently removed the result details from their Newsletter website page, due to pressure from IFRA (see <http://www.perfumerflavorist.com/newsletter/5957641.html>) and they have also been persuaded to publish an astonishing letter on the matter from Jean-Pierre Hourri (president of IFRA).

In this published letter, Houri fails to do his homework, and makes several ill-advised & inaccurate put-downs. He accuses Cropwatch, amongst other things, of being diametrically opposed to environmental issues (!). In fact Cropwatch (hint: the clue is in the name, Jean-Pierre!!) was set up initially solely to attempt to protect those rare & threatened species being over-exploited by the aroma trade (e.g. see [Burfield \(2003\)](#) & <http://www.cropwatch.org/cropwatch7.htm>), and correspondence on this topic with the EU Cosmetics Sector is on-going. Houri also claims that Cropwatch is diametrically opposed to consumer health – in fact my personal record of lecturing on safety matters over several years to industry can speak for itself. Finally Houri accuses Cropwatch of being a special interest group, but appears not to know what goes on within his own organization: IFRA have already published an information letter (No 737) on Natural Perfumes and IFRA's Matthias Vey has previously asked Cropwatch for information on maximizing the allowable percentage of certain naturals in finished fragrances. If Further, if IFRA are now not following & supporting the ascendancy of natural ingredients and natural perfumery, then they are in acute danger of becoming irrelevant.

On-line democracy in the aroma business has therefore been demonstrated by the success of P & F poll, the success of the Cropwatch petition and the enormous media interest in the Boycott topic. Cropwatch believes however that the various bodies concerned will do their utmost to ignore these results. The fundamental point here is that the regulatory process has to be opened up. At present there is no way that any person or end-user group with a viewpoint or technical argument can input into this roller coaster of fee-paying closed interest groups, privileged committees and 'expert' panels in the Brussels closed group. The regulatory process usually starts with deliberations from REXPAN or RIFM, is endorsed by IFRA, goes through SCCP and DG Enterprise, ready for the statute books as an EU Directive or Regulation. If, say, you as an outsider, wanted to challenge the science behind IFRA's 37th Amendment (and we do!), who is the independent authority which can be trusted do this impartially? Certainly, not the bodies that are already involved, on their past records.

Fragrance Anarchy Needs Preventing.

Cropwatch maintains that there is now a discernable loss of faith in the fragrance regulation process. When the people that work in the industry lose their respect for the system, or feel that it discriminates against their particular interests (as with small & micro-sized industries), or feel that there is an unequal situation between over-regulated fragrances and relatively under-regulated food flavourings, then those grievances need to be looked at. Above all, there is a certain percentage of the population which wants to continue to be able to use ingredients or perfumes containing natural aromatic ingredients, rather than synthetics. As we have indicated earlier, natural perfumes have all but been eliminated in practice by progressive legislation from the IFRA/EU Cosmetics Commission. Internet trading and a general black-market in natural perfumes, which flouts all safety considerations is becoming a distinct possibility, if it is not

here already. This is not what we want. We all need the rule of law, we all want to carry out or duty of due diligence, & we all have a duty of care to one another. But we can only do that through sensible regulation. And sensible regulation is precisely what we don't have.

Tony Burfield
Cropwatch.