STATEMENT

Code *GOS413 - PKS413*

PERFUME Apple & Cinnamon

22-10-2024

To whom it concerns

Musk statement
product GOS413 - PKS413 PERFUME Apple & Cinnamon
contains the following ingredients:

0,00 % (Musk) Nitromusk
0,00 % (Musk) Polycyclic musk
0,00 % (Musk) Macrocyclic musk

Vegan declaration
We have reviewed this product and declare that, to the best of our knowledge, it is suitable for the Vegan diet. Vegan products do not contain animal ingredients (mammalian, poultry, fish, shellfish, mollusk, insects) as well as ingredients derived from animal such as dairy, eggs and bee products or animal enzymes.

GMO directly added
(Declaration Limit: 0,01%)
According to the formulation – this fragrance oil does not contain ingredients produced on the basis of genetically modified organisms.

Animal Testing
We herewith confirm that our fragrances have not been the subject of animal testing by or on behalf of our company.

BSE / TSE
(Declaration Limit: 0,01%)
Our fragrances are mixtures of natural (plant origin) and synthetic products. To the best of our knowledge it does not contain any ingredients which may be suspected of BSE / TSE.

Heavy metals
SQ does not use any heavy metal for direct addition into fragrances, bases and ingredients. SQ does not undertake routine analysis on heavy metals and the potential presence of heavy metals in ingredient is of the order of magnitude of unavoidable traces. Based on our experience and to the best of our knowledge, the total quantity of heavy metals that may be present in this product are significantly below the limits defined in applicable regulations.

Nanomaterials
We certify, to the best of our knowledge, that this product does not contain any ingredient defined as a nanomaterial according to the article 2 of Cosmetic Regulation 1223/2009.
“Nanomaterial” means an insoluble or biopersistant and intentionally manufactured material with one or more external dimensions, or an internal structure, on the scale from 1 to 100nm.

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Palm Oil (PO) / Palm Kernel Oil (PKO) statement

This product contains the following ingredients:

0,000	%	Palm Oil (PO) or Palm Kernel Oil (PKO)
4,620	%	Palm Kernel Oil Derivative

RSPO Certified	Yes
Certificate	SUPPLIER's INFOMATION CONCEILED BY
No. Supply Chain Model	SOAPQUEEN EUROPE
Certificate Start Date	16 October 2019

HICC (Lyral), atranol and chloratranol

Please note that Commission Regulation (EU) 2017/1410 of 2 August 2017 amending Annexes II and III to Regulation (EC) No 1223/2009 of the European Parliament and of the Council on cosmetic products has been published in the Official Journal of August 3rd, 2017.
HICC, Atranol and chloratranol have been added to Annex II of the Cosmetic Products Regulation (list of substances prohibited in cosmetic products) with the entries 1380, 1381 and 1382:
• 3-(4-Hydroxy-4-methylpentyl) cyclohex-3-ene-1-carbaldehyde [CAS# 51414-25-6]
• 4-(4-Hydroxy-4-methylpentyl) cyclohex-3-ene-1-carbaldehyde [CAS# 31906-04-4]
• Atranol [CAS# 526-37-4]
• chloratranol [CAS# 57074-21-2]

Commission Regulation (EU) 2017/1410 also deletes the Annex III entry (79) for HICC with application from 23rd August 2021.

The presence of atranol and chloratranol, being natural components of oak tree moss and treemoss extracts1, is banned above technically unavoidable traces in good manufacturing practice. As purity requirements for both moss extracts have been established in IFRA Standards since 2009, all products on shelves should be compliant by the entry into force of this regulation.
The transitional periods are the following:

• From 23 August 2019, cosmetic products containing one or more of these substances shall not be placed on the European Union market.

• From 23 August 2021, cosmetic products containing one or more of these substances shall not be made available on the Union market.

0,000	%	• HICC (Lyral)
0,000	%	• Atranol [CAS# 526-37-4]

0,000 % • Chloratranol [CAS# 57074-21-2]

BMHCA (Lilial) ban in cosmetics
The 15th ATP1 to the EU CLP2 regulation, COMMISSION DELEGATED REGULATION (EU) 2020/1182, has been published on August 11th, 2020, in the Official Journal and will apply from 1 March 2022. It lists BMHCA (Lilial) on Annex VI as toxic for Reproduction category 1B (Rep. 1B, H360Fd).
Subsequently, BMHCA (Lilial) will be banned for the use in cosmetic products in the EU. The EU Commission will include this substance in the CMR Omnibus Act IV for integration into Annex II (list of prohibited substances in cosmetics) of the EU Cosmetics Regulation.

This means that by 1 March 2022 the use of BMHCA (lilial) in cosmetic products (new and existing) will be banned in the EU. All products containing BMHCA (lilial) should be off the shelf by this date.
It is important to highlight that the above-mentioned regulatory events and activities are limited to the EU. The use of BMHCA in cosmetic products outside the EU remains unaffected.

BMHCA (Lilial) restriction in household products (e.g. detergents, household and cleaning products, air-fresheners)
Please be informed that the ban of BMHCA also imposes a restriction to the placing on the market and use of BMHCA in household products for consumers and professional users.

The restriction, in practice, implies the following:
• BMHCA **cannot be placed on the market or used**, in products sold to the general public (consumers) **when its concentration is equal or above** the generic concentration limit specified in part 3 of Annex I of the EU CLP - i.e. **0.3%** (final product (mixture) is not classified as Rep 1B).
• BMHCA **may be placed on the market and used in products sold for professional use** above the classification concentration limit of **equal or above 0.3%** (product is classified as Rep 1B). In this case the packaging of such substances and mixtures has to be **marked** visibly, legibly and indelibly as **'Restricted to professional users'**.

This restriction applies to BMHCA as such, as constituent of other substances, or, in mixtures.

If the same applicability date as the EU CLP harmonized classification will be used, this would mean that from 1 March 2022 onward, consumer products containing 0.3% or more of BMHCA can no longer be sold in the EU.

0,000 % • BMHCA (Lilial)[CAS# 80-54-6]

Karanal on the EU – REACH Authorization List
• Karanal [CAS# 117933-89-8] - No use (delisted from pallet 17th July, 2023)

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We would like to inform you that, with the inclusion of Karanal (CAS 117933-89-8) on the EU REACH Authorization List, SQ has defined a reformulation plan which consists of replacing Karanal with a combination of ingredients that will give the same olfactive character, performance and stability.

SQ ensures that product safety and regulatory compliance are not impacted by the formula change. The materials used for the reformulation have been thoroughly reviewed and specifically selected based on their regulatory and safety profile so that the reformulation formula shows no negative impact on the final classification/safety of the formula or the allergen levels. Thus the modified formula is safe for consumer use and regulatory compliant.

The commercial name and code of the reformulated fragrance will not change.

The placing on the market and the use of Karanal (including the use in cosmetic products) will be prohibited from 27 August 2023 onwards. Fragrance batches produced after 27 August 2023 will be reformulated and free from Karanal.

This does not impact the use of Karanal in other regions outside of the EU. Customers outside of Europe may be impacted if their products are manufactured or marketed in Europe. If you have any questions, please contact your client support representative.

REACH

We, SQ declare, to the best of our knowledge, that we are in compliance with our obligations according to the REACH Regulation (EC) No. 1907/2006 and its modifications and updates for the substances contained in the fragrance compound(s)/ingredient(s) delivered to customer.

All substances supplied by SQ, as well as substances contained in our mixtures are either:

- Registered (SQ act as a downstream user as defined by the REACH Regulation), or
- Exempted of Registration

Any substances out of scope e.g. exempted substances or substances below the threshold for registration under REACH (<1tpa) are allowed to be used in products without registration in the EU.

The above mentioned information is continuously checked by us and also demanded to our suppliers. We also continue to monitor the ongoing amendments of the Regulation and will update our compliance statement as appropriate.

Biodegradability BO (Biodegradable Organics) % 79,1

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Please be aware that fragrance compounds are not tested for biodegradability. The biodegradability of a fragrance compound is assured based on data on the components and is assessed by summing the percentage (by weight) of ingredients which are biodegradable. The following criteria have been used to identify “biodegradable” fragrance ingredients used in above mentioned fragrance compound:

1. Biodegradable following internationally accepted OECD/ISO guideline studies accepted by authorities.

• The tests include OECD 301 series, OECD 310, OECD 302 series and ISO 14593;

• The pass criterion in these tests is 60-70% within 14 or 28 days (depending on the test and the endpoint measured);

• If biodegradation has started but a plateau has not been reached, the test may be prolonged (typically up to 60 days).

2. Use of simple structural read-across from known biodegradable ingredients to structurally very close analogues that aretherefore fully expected also to be biodegradable.

3. Natural complex substances (e.g. essential oils) are assessed based on either test data for the NCS itself or data for the constituents.

Publication of final Regulation of Methyl-N-methylanthranilate in cosmetic products in Europe

We would like to inform you that Commission Regulation (EU) 2022/135 has been published in the Official Journal of the European Union on January 31, 2022. It amends Regulation (EC) No 1223/2009 of the European Parliament and of the Council as regards the use of Methyl-N-methylanthranilate in cosmetic products.

It sets maximum use levels of 0.1% in leave-on products and 0.2% in rinse-off products. Please note that the material should not be used in sunscreen products and products marketed for exposure to natural or artificial UV light.

From 21 August 2022 cosmetic products containing the substance and not complying with the restrictions shall no longer be placed on the EU market (i.e. new products). From 21 November 2022 the products shall not be made available (i.e.existing products) on the Union market.

0,000 % Methyl-N-methylanthranilate

Benzophenone - Publication of the 18th ATP to the EU CLP Regulation

We would like to inform you that the 18th ATP to the EU CLP regulation, (COMMISSION DELEGATED REGULATION (EU) 2022/692) was published on May 3rd, 2022 and will enter into force on the twentieth

day following that of its publication in the Official Journal of the European Union. The new/revised classifications shall apply as from 1 December 2023.

Please note that index number 606-153-00-5 corresponds to benzophenone (CAS No 119-61-9 / EINECS No 204-337-6) classified as Carcinogenic 1B (H350).

This means that this substance will be restricted in household products and air care products in the EU according to the REACH restriction entry number 28 (see REACH Annex XVII).

Regarding the use of benzophenone in cosmetics, it will be forbidden for this use on 1 December 2023 if no exemption request is submitted according to article 15.2 of the Cosmetics Regulation. This will happen through the publication of a CMR Omnibus to the EU Cosmetics Regulation.

0,000 % Benzophenone

Natural Origin Content

Natural Origin Content according to ISO 16128:

3,000 %

SCCS/1656/23 Preliminary Opinion
Benzyl Salicylate (CAS No. 118-58-1, EC No. 204-262-9)

Based on the data provided and assessed and taking under consideration the concerns related to potential endocrine disrupting properties, the SCCS considers Benzyl Salicylate safe when used up to the maximum concentrations provided in Table 1 of this Opinion.

Table 1: Maximum use concentrations of benzyl salicylate in cosmetic products

Type of cosmetic product exposure	Maximum % concentration used
Hydroalcoholic-based fragrances (spray and non-spray)	4
Rinse-off skin & hair products (except rinse off body products)	0.5
Rinse off body products	1.3
Leave on skin & hair products (non-spray/non-aerosol)(except body lotion)	0.5
Leave on hair products (spray/aerosol)	0.5

Leave on body products (non-spray/spray/aerosol)	0.7
Face make-up products and make-up remover	0.2
Oral care	0.004
Deodorant products (spray/aerosol)	0.91

0,000 % Benzyl Salicylate

SCCS/1658/23 Preliminary version Opinion on
Hexyl Salicylate (CAS/EC No. 6259-76-3/228-408-6)

Based on the assessment of data provided and taking into consideration the concerns related to potential endocrine disrupting properties, the SCCS considers Hexyl Salicylate safe when used up to the maximum concentrations as provided in Table 1 of this Opinion.

Table 1: Maximum concentrations of Hexyl Salicylate in cosmetic products as reported in the dossier submission.

Product type, Body parts	**Maximum concentration**
Hydroalcoholic-based fragrances	2
All Rinse-off products	0.5
All Leave on products	0.3
Oral care (toothpaste and mouthwash)	0.001

0,000 % Hexyl Salicylate

Heliotropine (CAS: 120-57-0) – ECHA RAC adopted their Opinion on the harmonized classification and labelling (CLH) proposal as toxicity to reproduction Category 1B.

We would like to inform you that the ECHA RAC 69 plenary meeting of June 4, 2024 has adopted the Opinion to classify Heliotropine / piperonal; 1,3-benzodioxole-5-carbaldehyde (CAS: 120-57-0) as follows: skin sensitisation (Skin Sens. 1B; H317) and toxic to reproduction (Repr. 1B; H360FD).

We also remind you of the regulatory consequences under the EU Cosmetic Products Regulation (Regulation (EC) No 1223/2009), i.e., a ban if no exemption is granted, and under the EU REACH Regulation (Annex XVII), i.e., a restriction equal to or above the classification concentration limit of 0.3%, in relation to substances with harmonised classification and labelling as CMR 1B.

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Next steps in the regulatory process.

Heliotropine, piperonal, 1,3-benzodioxole-5-carbaldehyde (CAS: 120-57-0)

RAC 69 plenary	3-7 June 2024 **(RAC adopted their opinion on 4 June 2024)**
CARACAL discussion	2025
Publication in the OJ (ATP[1]) (18 months transitional period)	2026
Application of the ATP (Ban in cosmetics and Restriction under REACH)	2028

0,160 % Heliotropine

With kind regards,
SQ
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