



European Federation of Allergy and Airways  
Diseases Patients' Associations

## **EFA draft position on the labelling of fragrance allergens**

As the European Federation representing people with allergies and airways diseases in Europe (EFA), our guiding principle is that people with allergies, such as skin allergy, should be able to avoid any substance harmful for their health, based on clear, transparent, accessible and timely information.

While we thank the European Commission for the initiative to assess current fragrance allergens labelling, we consider choosing “No policy action” would deprive the 30% of Europeans that live with allergies and airways diseases of their fundamental right to information, leaving them unprotected from a potential allergic reaction. As patient representatives, we rely on public institutions to regulate issues affecting our health with legally binding requirements, avoiding voluntary schemes.

Consumer protection in the case of allergen labelling can only be guaranteed through ‘on-pack labelling’, as its immediate nature makes it the most accessible and transparent information method. As patients, we care and value our health before any package design. Moreover, we do not find inconvenient in having printed the up to 10 allergenic substances per product in a package.

The future is digital and we welcome solutions and tools meant to improve patients’ lives. However, health prevention cannot rely only on digital means. EFA finds that exclusive e-labelling for fragrance allergens has its drawbacks: firstly, it raises issues of handling information in terms of the maintenance and update of allergen labelling online, compliance and permissions. Secondly, it assumes digital literacy, and technology (smartphone, barcode and/or QR code reader, internet connection), shifting the responsibility to the consumer. Lastly, e-labelling the 62 new allergens while leaving the current 26 on-pack fragments information unnecessarily, potentially misleading consumers. EFA therefore supports e-labelling as complementary to the on-pack information, but not as a replacement. Only a full on-package fragrance allergens list can help consumers avoid harmful ingredients.

In light of recent scientific evidence, we expect priority is given to updating the methods to measure the presence of the 62 new fragrance allergens. We also hope the resulting policy will encourage the European Union institutions to regulate towards safer substances, so that manufacturers gradually substitute substances linked to skin allergy, with harmless and natural ones, as a step towards allergen-free products in the personal hygiene and cosmetic sectors.

Finally, we consider there is a need to look beyond cosmetic products and to go deeper into the respiratory health effects triggered by soaps, detergents and maintenance products, which also contain fragrance allergens as well as other volatile chemicals. Certain substances used in that sector cause breathing distress and allergic reactions among people with airways diseases and negatively affect indoor air quality.