

Fragrance allergens corrigendum – explanatory note

NOTE: this explanatory note must be read as complementary guidelines to the Cosmetics Europe's guidelines on fragrance allergens ([Guidelines on the "Fragrance Allergens" Requirements - Cosmetics Europe](#)).

On the 11 November 2025 the Commission published a Corrigendum to Commission Regulation (EU) 2023/1545 ([Regulation - 2025/90876 - EN - EUR-Lex](#)).

This explanatory note provides recommendations on the most appropriate way to implement the fragrance allergens provisions set out in entry 364 (Pelargonium graveolens oil) and 365 (Pogostemon cablin oil) in a way that is best aligned to the approach applied to grouped entries set out to other fragrance allergens entries and thus to best align to the spirit of the legislator.

Reference number	Substance identification				Restrictions			Wording of conditions of use and warnings
	Chemical Name/INN	Name of Common Ingredients Glossary	CAS number	EC number	Product type, body parts	Maximum concentration in ready for use preparation	Other	
a	b	c	d	e	f	g	h	i
'364	Pelargonium graveolens oil (*)	Pelargonium Graveolens Oil Pelargonium Graveolens Flower Oil Pelargonium Graveolens Leaf Oil	90082-51-2/ 8000-46-2	290-140-0/ -			The presence of the substance shall be indicated in the list of ingredients referred to in Article 19(1), point (g), when its concentration exceeds: — 0,001 % in leave-on products — 0,01 % in rinse-off products'	

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'365	Pogostemon cablin oil (*)	Pogostemon Cablin Oil Pogostemon Cablin Leaf Oil	8014-09-3/ 84238-39-1	-/ 282-493-4			The presence of the substance shall be indicated in the list of ingredients referred to in Article 19(1), point (g), when its concentration exceeds: — 0,001 % in leave-on products — 0,01 % in rinse-off products'	

Originally, entry 364 and 365 contained only one name under columns (c). However, it has become clear that both entries have more than one recognised INCI name, meaning that these two entries should be considered as grouped entries, as described in the Cosmetics Europe guidelines on fragrance allergens. The newly added names are highlighted in yellow in the images above.

Unfortunately, despite adding the missing INCI names, the corrigendum does not go as far as formally introducing a Grouping Name (GN) in column (h). This discrepancy could lead to confusion and varying interpretations are possible.

Even though **several options are legally possible**, Cosmetics Europe recommends applying the following approach so as to align implementation to the approach sought by the legislator for grouped entries:

- The sum of the concentrations of all ingredients covered by column (c) should be used to verify if the labelling threshold (LT) is exceeded. For example, if a cosmetic product contains Pelargonium graveolens flower oil and Pelargonium graveolens leaf oil (as ingredient and/or in the fragrance mixture), the two concentrations should be summed to check against the LT. The same logic applies if you use, for example, Pelargonium graveolens flower oil as cosmetic ingredient and Pelargonium graveolens flower oil is used in the fragrance mixture: both concentrations are to be summed up as it is the presence of the substance above the LT that triggers the labelling requirement.
- **If the LT is exceeded, the most generic/broad INCI name should be used for labelling in the same manner as a GN: i.e. "PELARGONIUM GRAVEOLENS OIL" for entry 364 and "POGOSTEMON CABLIN OIL" for entry 365.**

This interpretation is possible as the generic INCI name can be used to cover the Single Name - SN (e.g.: PELARGONIUM GRAVEOLENS OIL can be used as generic name of PELARGONIUM GRAVEOLENS LEAF OIL)

Examples are provided in table one to illustrate the recommendation provided in this explanatory note.

Table 1 – Examples with POGOSTEMON CABLIN LEAF OIL to illustrate the concept described in this explanatory note.

concentration of the allergen in a rinse-off product originating from				on the label		
(a) fragrance or aroma mixture	(b) NCS (essential oil, botanical extract)	(c) impurity or contaminant	e) its intentional addition as cosmetic ingredient	Group Name (GN) to be labeled?	Single Name (SN) to be labeled?	Recommendation to fulfil the mandatory labelling requirement
Pogostemon Cablin Leaf Oil = 0.006% AND Pogostemon Cablin Oil = 0.005% Σ=0.011% >(LT)	none	none	none	n/a (no grouping name formally defined – the requirement is to label if the Σ of concentrations > LT, but it does not specify which name to use)		Recommended to label Pogostemon Cablin Oil (as the most generic name) to fulfil the requirement.
none	none	none	Pogostemon Cablin Leaf Oil = 0.015%>(LT)	n/a (no grouping name formally defined – the requirement is to label if the Σ of concentrations > LT, but it does not specify which name to use)		Recommended to label Pogostemon Cablin Oil (as the most generic name) to fulfil the requirement. The specific name - Pogostemon Cablin Leaf Oil – may be added as additional information.
Pogostemon Cablin Oil = 0.009%<(LT)	none	none	Pogostemon Cablin Leaf Oil = 0.015%>(LT)	n/a (no grouping name formally defined – the requirement is to label if the Σ of concentrations > LT, but it does not specify which name to use)		Recommended to label Pogostemon Cablin Oil (as the most generic name) to fulfil the requirement. The specific name - Pogostemon Cablin Leaf Oil – may be added as additional information.
Σ=0.024% >(LT)						