Introduction

This document is intended to guide suppliers when developing fragrances for The Body Shop. The fragrance products covered by the Guidelines include: fine fragrances, teen fragrances, deodorant fragrances, fragrance bar perfume oils and home fragrances (burning oils, pot pourri oils, scented sachets, incense sticks, room sprays).

The Body Shop has produced these guidelines in order to take account of the concerns and demands of its customers and opinion-forming organisations. Historically The Body Shop, because of its market position, has been subject to media attention concerning the use of certain materials and these guidelines are written to help minimise problems in the future. Materials appear on these lists for a variety of reasons, not all of which are justifiable from a scientific point of view.

This document is subject to regular review and revision in order to take account of media concerns and new scientific data.

These fragrance guidelines should be read in conjunction with The Body Shop Development Guidelines – Formulated Products.
Reason for Issue – Changes In This Revision

1. Change of entry for Benzyl Alcohol or other materials approved as preservatives from restricted to prohibited

2. Addition and clarification of requirements in Section 1 (Technical Documents)

3. Addition of information to Section 13 (The EU Dangerous Preparations Directive) – tactile symbol

4. Addition of request for banded formulations to Section 11 (Provision of Formulation Details)

Contact Details

If you want to confirm that this is the latest issue of this document please send an email to Paul.Wilkes@the-body-shop.com with the phrase ‘Request Fragrance Dev Guide’ in the subject field.

If you have any queries with regard to these guidelines please contact:

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Liz.Coy@the-body-shop.com
Prohibited Materials

The materials that appear on this list must not be used in any new fragrance or fragrance-containing product formulated for The Body Shop for sale in any country.

Restricted Materials

The materials that appear on this list must not be used in any cosmetic product formulated for The Body Shop for sale in any country, subject to the exceptions listed. In some instances, for technical reasons, formulators may feel that they need to use materials on this list. In order to do so they must be able to demonstrate that there are no alternatives to the use of a particular material, and this must be agreed with The Body Shop.
<table>
<thead>
<tr>
<th>Item</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. Technical Documents</strong></td>
<td>All fragrance submissions must be accompanied by the documents listed opposite which should be supplied to The Body Shop Technical Information Department.</td>
</tr>
<tr>
<td>1.1</td>
<td>A statement confirming that the perfume meets the IFRA guidelines. <a href="http://www.ifraorg.org/">IFRA website: http://www.ifraorg.org/</a></td>
</tr>
<tr>
<td>1.2</td>
<td>Material Safety Data Sheet.</td>
</tr>
<tr>
<td>1.3</td>
<td>Product Specification.</td>
</tr>
<tr>
<td>1.4</td>
<td>EFFA (European Flavours and Fragrance Association) style assessment.</td>
</tr>
<tr>
<td>1.5</td>
<td>Against Animal Testing Declaration.</td>
</tr>
<tr>
<td>1.6</td>
<td>Raw Material Information forms.</td>
</tr>
<tr>
<td>1.7</td>
<td>Fragrance triangle to include top, middle and base notes and in addition the fragrance description, preferably to be included at the bottom of the fragrance triangle.</td>
</tr>
<tr>
<td>1.8</td>
<td>The Body Shop Declaration of Conformity Form.</td>
</tr>
<tr>
<td>1.9</td>
<td>Letter of confirmation of cost</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>2. Prohibited Materials</strong></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>(P) 2.1</td>
<td>Any animal derived materials.</td>
</tr>
<tr>
<td>2.2</td>
<td>Rosewood Oil or any other material extracted from a natural source that is endangered.</td>
</tr>
<tr>
<td>2.3</td>
<td>Nitromusks (for example: Musk Ketone, Musk Xylene).</td>
</tr>
<tr>
<td>2.4</td>
<td>Polycyclic Musks.</td>
</tr>
<tr>
<td>2.5</td>
<td>Non-polymeric Phthalates (for example: Diethyl, Dimethyl, Dibutyl Phthalate).</td>
</tr>
<tr>
<td>2.6</td>
<td>Mineral oils.</td>
</tr>
<tr>
<td>2.9</td>
<td>Materials listed in the general development guidelines as prohibited or restricted for general use in cosmetic products (e.g. ‘must not contain BHT or BHA’ - the use of antioxidants is discouraged unless technically absolutely necessary).</td>
</tr>
<tr>
<td>-----</td>
<td>-------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>2.10</td>
<td>Estragole – must not be intentionally added. Small amounts arising from natural ingredients are acceptable.</td>
</tr>
<tr>
<td>2.11</td>
<td>Preservatives approved by regulation, such as Benzyl Alcohol and Phenoxyethanol.</td>
</tr>
</tbody>
</table>
3. Restricted Materials

Fragrances may contain these materials as components or diluents, subject to approval by The Body Shop.

NOTE: These materials should not be used if alternatives are available - discuss with The Body Shop before including these materials in fragrances.

3.1 Dipropylene Glycol - to the maximum specified by category of finished product (see document: The Body Shop Development Guidelines - Formulated Products).

Maximum of 5% Dipropylene Glycol in fragrances for use in bar soap products (please note this is 5% maximum in the fragrance, not in the finished product).

Dipropylene Glycol is acceptable for use in Home Fragrance Oils (i.e. Burning Oils). Inclusion of other glycols not specified above in formulations is subject to discussion and agreement by The Body Shop.

3.2 Ethanol.

3.3 Triethanolamine.

3.4 Any of the ingredients included in the 7th Amendment to the EU Cosmetics Directive and which if present in a formulation above certain concentrations are required to be listed on the label of the finished cosmetic product.

NOTE: Where there are commercially and olfactory alternative materials available, the preference is for these to be used. Those that are required should be limited in number to those absolutely necessary to the formulation - these must be disclosed in the Fragrance Declaration form.

List of Fragrance Materials To Be Listed On Cosmetic Product Labels (7th Amendment)

1. Common name: Amyl cinnamal
Chemical name: 2-benzylideneheptanal
Synonyms: a-amyl cinnamic aldehyde
CAS No: 122-40-7
EINECS 204-541-5

2. Common name: Amylcinnamyl alcohol
Chemical name: 2-pentyl-3-phenylprop-2-en-1-ol
Synonyms: a-amyl cinnamic alcohol
CAS No: 101-85-9
EINECS 202-982-8
<table>
<thead>
<tr>
<th>No.</th>
<th>Common name</th>
<th>Chemical name</th>
<th>CAS No.</th>
<th>EINECS No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.</td>
<td>Benzyl alcohol</td>
<td>Benzyl alcohol</td>
<td>100-51-6</td>
<td>202-859-9</td>
</tr>
<tr>
<td></td>
<td>Benzyl salicylate</td>
<td>Benzyl-o-hydroxybenzoate</td>
<td>118-58-1</td>
<td>204-262-9</td>
</tr>
<tr>
<td></td>
<td>Cinnamyl alcohol</td>
<td>Cinnamyl alcohol</td>
<td>104-54-1</td>
<td>203-212-3</td>
</tr>
<tr>
<td></td>
<td>Cinnamal</td>
<td>Cinnamaldehyde; 3-phenyl-2-propenal</td>
<td>104-55-2</td>
<td>203-213-9</td>
</tr>
<tr>
<td></td>
<td>Citral</td>
<td>3,7-dimethyl-2,6-octadien-1-al, mix of cis and trans isomers</td>
<td>5392-40-5</td>
<td>226-394-6</td>
</tr>
<tr>
<td></td>
<td>Coumarin</td>
<td>1-benzopyran-2-one; cis-o-coumarinic acid lactone</td>
<td>91-64-5</td>
<td>202-086-7</td>
</tr>
<tr>
<td></td>
<td>Eugenol</td>
<td>Eugenol</td>
<td>97-53-0</td>
<td>202-589-1</td>
</tr>
<tr>
<td></td>
<td>Geraniol</td>
<td></td>
<td>106-24-1</td>
<td>203-377-1</td>
</tr>
</tbody>
</table>
11. Common name: **Hydroxycitronellal**  
Chemical name: 7-Hydroxycitronellal  
Synonyms: Laurine  
CAS No: 107-75-5  
EINECS No: 203-518-7

12. Common name: **Hydroxymethyl-pentylecyclo-hexenecarboxaldehyde**  
Chemical name: 4-(4-Hydroxy-4-methylpentyl)cyclohex-3-enecarbaldehyde  
Synonyms: Lyral  
CAS No: 31906-04-4  
EINECS No: 250-863-4

13. Common name: **Isoeugenol**  
Chemical name: Isoeugenol  
CAS No: 97-54-1  
EINECS No: 202-590-7

14. Common name: **Anisyl alcohol**  
Chemical name: 4-methoxybenzyl alcohol  
CAS No: 105-13-5  
EINECS No: 203-273-6

15. Common name: **Benzyl benzoate** [INCI]  
Chemical name: Benzyl benzoate  
CAS No: 120-51-4  
EINECS No: 204-402-9

16. Common name: **Benzyl cinnamate** [INCI]  
Chemical name: Benzyl 3-phenyl-2-propenoate  
Synonyms: Cinnamcine  
CAS No: 103-41-3  
EINECS No: 203-109-3

17. Common name: **Citronellol** [INCI]  
Chemical name: 3,7-Dimethyl-6-octenol  
CAS No: 106-22-9  
EINECS No: 203-375-0
18. Common name: **Farnesol** [INCI]
   Chemical name: 3,7,11 trimethyldodeca-2,6,10 trienol
   CAS No: 4602-84-0
   EINECS No: 225-004-1

19. Common name: **Hexyl cinnamaldehyde**
   Chemical name: α-hexyl cinnamaldehyde
   CAS No: 101-86-0
   EINECS No: 202-983-3

20. Common name: **2-(4-tert-Butylbenzyl)propionaldehyde (Lilial)**
   Chemical name: 2-(4-tert-Butylbenzyl)propionaldehyde; 4-(1,1-Dimethylethyl)-a- methylbenzenepropanial; p-tert-Butyl-a-methylhydrocinnamaldehyde
   Synonyms: Lilial, Lilestral
   CAS No: 80-54-6
   EINECS No: 201-289-8

21. Common name: **d-Limonene**
   Chemical name: (R)-p-Mentha-1,8-diene
   CAS No: 5989-27-5
   EINECS No: 227-813-5

22. Common name: **Linalool** [INCI]
   Chemical name: Linalool
   CAS No: 78-70-6
   EINECS No: 201-134-4

23. Common name: **Methyl heptine carbonate**
   Chemical name: Methyl oct-2-ynoate
   CAS No: 111-12-6
   EINECS No: 203-836-6

24. Common name: **3-Methyl-4-(2,6,6-trimethyl-2-cyclohexen-1-yl)-3-buten-2-one**
   Chemical name: 3-Methyl-4-(2,6,6-trimethyl-2-cyclohexen-1-yl)-3-buten-2-one
   Synonyms γ -methylionone
   CAS No: 127-51-5
   EINECS No: 204-846-3

25. **Tree Moss extracts**
   Oakmoss absolute (Evernia spp.)
   CAS No: 9000-50-4
<table>
<thead>
<tr>
<th>Oakmoss resinoid (Evernia spp.)</th>
<th>CAS No: 9000-50-4</th>
</tr>
</thead>
</table>

### 26. Oak Moss extracts
- Treemoss absolute (Usnea spp.)
  - CAS No: 68648-41-9
- Treemoss concrete (Usnea spp.)
  - CAS No: 68648-41-9
- Treemoss resinold (Usnea spp.)
  - CAS No: 868648-41-9
<table>
<thead>
<tr>
<th>4. Modifications After Initial Submission</th>
</tr>
</thead>
<tbody>
<tr>
<td>Any modification the supplier wishes to make to the formulation of the fragrance after the initial submission or purchase must be notified in writing to The Body Shop stating the proposed change and the reason.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>5. Diluents</th>
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</thead>
<tbody>
<tr>
<td>Versions of fragrances for toiletries products must not contain unnecessary diluents. As little diluent as necessary should be used to meet technical or cost requirements (the latter requires the agreement of The Body Shop).</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>6. Fragrances For Direct Application To The Skin</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fragrance submissions intended for direct application to the skin (such as perfume oil) must be diluted to an appropriate level (usually 20%) with a diluent or diluents blend approved by The Body Shop. All diluents added at 5% or above must be declared quantitatively.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>7. Fragrances Diluted In Ethanol</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unless otherwise agreed, fragrances intended for dilution in Ethanol should not contain any materials that are likely to cause a precipitate or cloudiness in the solution that cannot be removed by standing for three days at ambient temperature and then filtration after chilling to 0°C.</td>
</tr>
</tbody>
</table>

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<thead>
<tr>
<th>8. Fragrances For Burning Oils</th>
</tr>
</thead>
<tbody>
<tr>
<td>Submissions of fragrances intended for use as Burning Oils must be supplied as finished product in suitable carrier/diluent for this purpose (these oils are supplied to contractors for filling only, not for further processing).</td>
</tr>
</tbody>
</table>
9. Stability

Fragrances must have an acceptable level of physical and chemical stability as supplied and for the intended use as briefed and should exhibit minimal discoloration on storage unless otherwise agreed. The incorporation in the perfume of Schiff bases or any other potentially discolouring materials should be declared.

Stability testing must be carried out to The Body Shop stability protocol on selected approved fragrances for alcoholic products, Perfume Oils and essential oils that will be sold to the consumer as a finished product.

10. Finished Product Line Extensions

Consideration should be given to potential product line extensions when submitting fragrances, which might include product matrices other than that initially briefed.

11. Provision of Formulation Details

Suppliers of fragrances to The Body Shop or its authorised contract manufacturers must divulge sufficient technical details of a fragrance to enable its toxicology to be assessed and to assist in cases of customer complaints and accidental ingestion. Such information may be subject to a Confidentiality Agreement between the parties. Specifically, The Body Shop prefers fragrance manufacturers to provide banded formulations to permit fast responses to accidental ingestions or other adverse events.

12. Helpline

Information must be supplied regarding 24 hour access to technical assistance in the event of an emergency.
13. The EU Dangerous Preparations Directive

Fragrances intended for use in home fragrance products (burning oils, pot pourri oils, room sprays) i.e. non-cosmetic products only:

The Body Shop wishes to minimise labelling of the finished product with R or S phrases according to the EU Dangerous Preparations Directive. However, this is not to be at the expense of product performance.

Raw materials must not be used in fragrances if their inclusion triggers the labelling of the finished product with the ‘harmful to health’ symbol (black cross on orange background), the tactile warning label and associated warning phrases.

To achieve this requires that individual components of the fragrance that are labelled R43 must be used at concentrations of less than 1%. It is acceptable to use these components at concentrations of less than 1% which will consequently trigger the warning phrase opposite, but not the ‘harmful to health’ symbol.

Directive 1999/45/EC of the European Parliament and of the Council of 31 May 1999 concerning the approximation of the laws, regulations and administrative provisions of the Member States relating to the classification, packaging and labelling of dangerous Preparations’ requires that labelling of dangerous properties of raw materials be carried through to the finished product, depending on certain concentration criteria. The labelling with which The Body Shop is primarily concerned is that for raw materials that are skin sensitisers, when the finished product label must carry the R43 phrase: ‘May cause sensitisation by skin contact’ and the accompanying S37 phrase: ‘Wear suitable gloves’.

There is a derogation from labelling other R and S phrases for small containers (<125 ml) which generally means that The Body Shop fragrance products will only be subject to the phrases mentioned above, if this is warranted by the chemical composition.

The legislation requires that a preparation containing $\geq$ 1% of an R43 chemical must also be classified as R43. If there is more than one R43 chemical the amounts are not additive. The chemicals that give rise to the R43 classification must appear on the label and the MSDS for the product. At present the EINECS name must be used – this differs from the INCI name.

If a preparation is not classified as R43 but contains 0.1 to 1% of any R43 chemical a warning label is required.

‘Contains (name of sensitising substance). May cause an allergic reaction.’

Not all of the 26 allergens in the 7th Amendment to the Cosmetics Directive have been classified as R43 and there are some chemicals classified as R43 that do not appear on this list of 26 allergens.

Link to UK HSE website

14. Material Safety Data Sheet (MSDS)

An MSDS must be supplied that conforms to the requirements of the EU Dangerous Preparations Directive. This will include the relevant R phrases for the preparation and a list of materials (by percentage composition) that contribute to the classification of the preparation.
15. Flavours
Compounds which are added to formulations as flavours rather than fragrances must be declared as flavour in the documentation supplied to The Body Shop. Flavours must be declared as ‘Aroma’ on the EU INCI ingredients list for the finished product.

| Flavours must meet the GRAS (Generally Recognised As Safe) requirements of FEMA (Flavor & Extract Manufacturers' Association) and of EFFA (European Flavor and Fragrance Association). |

16. Typical Fragrance Levels In The Body Shop Non-cosmetic Products
Provided as an aid to meeting the requirements in the sections above.

| Sachet 3-4%  
| Candle 5%  
| Incense Stick 10%  
| Pot Pourri 5%  
| Burning Oils 100% (10 ml bottles)  
| Room sprays maximum 3% (typically 100 ml bottle) |