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Sendt: 23. januar 2015 10:15
Til: MST - Kemikalier Høringsvar
Cc: Hanna Løyche; Stine Fabricius
Emne: Kommentarer til LOUS Parfumestoffer

Til rette vedkommende:

Hermed kommentarer fra Brancheforeningen SPT til den seneste version af LOUS kortlægning af parfumestoffer:

Generelt: Flere steder er der brugt ordet "allergic" i stedet for "allergenic"

I nedenstående har jeg copy pastet dele af teksten og kursiveret den del, jeg har kommentarer til.

p. 13:

Based on data on elicitation levels in sensitised individuals, SCCS (2012) concluded that a level of exposure for fragrances of up to 0.01% may be tolerated by most consumers with contact allergy to fragrance allergens based on dose elicitation studies available. Such a threshold based on elicitation levels in sensitised individuals is believed to be sufficiently low to protect both sensitised individuals and most of the non-sensitised consumers from developing contact allergy. For some products such a concentration limit will not be feasible. For example eau de perfume may contain concentrations of several percent of a single fragrance, while for other types of products, it may be possible to keep the fragrance concentrations at a low level and still maintain the advantage of the fragrance. However, it is important to stress that a general threshold of 0.01%, although limiting the problem, does not preclude that the most sensitive segment of the population may react upon exposure to these levels. *Hence, this threshold does not remove the necessity for providing information to the consumer concerning the presence of the fragrance substance in cosmetics and other products containing fragrance.*

Deklarationspligten kræver jo kun deklaration af stoffet når det findes i koncentrationer over grænsen. Siger I hermed, at I ikke er enige i reguleringen? – det er ikke klart for mig.

p.14

Perspective - datagaps

This survey on fragrance substances has shown that a large group of substances is used to produce perfumes and for some of them a limited amount of data is available on their use and possible impact on health and/or environment. For many of the substances their use in cosmetics is wellknown. However, the information on which specific fragrance substances used in other product types is limited. Thus, surveys of their use in other consumer products could add value to information on impact on human health. Additional, *the impact of declaration of specific fragrances on consumer products on the frequency of contact allergy* in the general population should be investigated to elucidate the effects of the regulation. This could also illustrate whether this kind of provision would add value for other consumer products than cosmetics and detergents.

Deklarationspligten for specifikke allergene parfumestoffer har ikke til formål at reducere prevalensen af allergi, den har til formål at give allergikere mulighed for at bruge produkter uden de stoffer, som de allerede er blevet allergiske over for. Det kunne være interessant at undersøge om deklaraionspligten har hjulpet allergikere til at vælge produkter med andre parfumestoffer end dem, de ikke kan tåle, da dette var hele ideen med deklaraionspligten.

Mange hilsner

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SPT Temadag
**Sikkerhedsvurdering af
kosmetiske produkter**
Den 27. januar 2015
kl. 10.30-16.30

The poster features a laboratory setting with test tubes and pipettes on the left, and a stack of colorful books on the bottom left. The text is centered and uses a serif font for the main title.