



Building Consumer Trust With Greater Transparency

By Mania Bankova* and Catalina Monroy**

Personal, Home and Oral Care products bring health, hygiene, confidence and other benefits to daily life. The scent or taste of these products carry the promise of expected performance and functionality, and sometimes deliver the winning “wow factor” that drives brand choice.

All of the ingredients we use -- including those in our fragrances and flavors -- are thoughtfully selected not only for the benefits they deliver, but also to meet the highest regulatory and safety standards. The choices we make are based on thorough safety evaluations and take into consideration the latest scientific evidence. More and more, consumers scrutinize the ingredients in their products, and we want them to have confidence in choosing our brands. We listen to them and the questions they raise about ingredients, and where we see opportunities regarding ingredients that are raising consumer questions, we substitute with other safe ingredients that provide the same or better benefits.

Another way we're earning consumer trust is with higher levels of ingredient transparency. With this purpose, we launched

F&F Share for Good, our fragrance and flavors ingredient program. Through this initiative, we've become the first major company to share the flavor ingredients that delight the senses when using toothpaste and mouthwash. Including flavor ingredients in our disclosure initiative is an exciting opportunity to engage with more people by providing information that makes them feel confident in their purchasing decisions and helps them enjoy their preferred choices.

The Fragrances and Flavors in the products we love

Scent and taste bring pivotal value to the brand, defining its identity. For oral care products, they communicate functionality: efficacy, freshness, longevity, malodor control, and therapeutic benefits. Scent and taste have the power to reinforce the product narrative, making brushing more enjoyable, inspiring healthy habits, and encouraging compliance with an oral care regimen. They provide texture to our lives – create intimate moments, evoke memories, and deepen our experiences with the world around us.

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Fragrances and flavors appear on product labels as a simple word: “fragrance”, “flavor”, “aroma” to protect the know-how of the creator. But that one word likely represents complex mixtures of single-component ingredients and natural complex substances like essential oils, extracts, and absolutes.

Compliance Through Regulatory and Voluntary Measures

Considering the important role of fragrances and flavors and their complex composition, we hold their development and use to the highest standards of compliance and safety. We are conscious of how crucial it is to keep our consumers informed, and we allocate a lot of time and resources to support the disclosure of the ingredients that are used in our Flavors and Fragrance development, in collaboration with our supplier-partners.

To ensure that our Flavors and Fragrances are produced to the highest standards and meet all regulatory requirements, we've integrated rigorous controls, which include the following:

- In the U.S., an independent Expert Panel of the Flavor and Extract Manufacturers Association is the primary body that assesses the safety of flavoring ingredients used in the United States. The Expert Panel reviews whether a flavor is Generally Recognised as Safe (GRAS) under U.S. Food and Drug Administration (FDA) standards. If the Expert Panel determines that a flavoring ingredient is considered GRAS, it submits that determination along with supporting documentation to the FDA. The information is also available to the public on the FEMA website. FEMA GRAS status provides consumers with assurance that the flavor ingredients used in the products are safe. The International Association of the Flavor Industry (IOFI) assures the safety and proper use of flavorings through highly reliable, state-of-the-art science. It maintains and publishes the Global Reference List (GRL) of materials that have been reviewed and determined to be safe for food.

- Any cosmetic product placed on the European market must comply with the provisions of EU Regulation 1223/2009 (the Cosmetic regulation), and this also includes ingredients used in fragrances. The Cosmetic regulation provides the requirements for the labeling of the 26 fragrance allergens, lists fragrance ingredients that are banned and sets the limits for those with restricted use.

- The International Fragrance Association (IFRA) is an independent international authority that guides the industry on the fragrance and flavor ingredients safety. The IFRA standards are the rules providing recommendations on banned and restricted use of substances based on the independent sound scientific evaluations conducted by the Research Institute of Fragrance Materials (RIFM). Though the IFRA Code of Practice is not legally binding, its authority in ingredients safety is so well established, it is expected that fragrances and flavors used in products will comply with IFRA standards. The recently released IFRA 49 Amendment included a lot of significant changes that further strengthen the safe use of fragrance materials. The standards were updated with 91 revised and 25 new entries. The large number of changes were accompanied by a new assessment protocol based on an aggregated exposure model to establish new exposure limits. A new

category of dermal sensitization was added along with new sub-categories for systemic toxicity and phototoxicity. The product categorization also was changed.

Transparency today: Not only Fragrances, Flavors are in the scope too

Retailers are hearing from shoppers and, as a result, are seeking increased ingredient transparency from consumer goods companies. Specifically, they are seeking fragrance and flavor details so they can screen products for the presence of “ingredients of concern” included in their Chemical policies or High Priority Chemical lists. The retailers use these ingredient disclosures and “not contain” declarations to help choose the products they offer for sale.

Third party product certification communicates to consumers that a product has been thoroughly vetted against environmental and human health criteria. Certifications like EPA Safer Choice, EU Eco Label, and Green Seal have very rigorous criteria for fragrance materials and require disclosure of significant levels of such information to gain certification.

In the U.S. the state of California has been at the forefront of transparency initiatives, including with the enactment of the California Cleaning Product Right to Know Act of 2017. Among the many details of this complex law, essential for compliance related to fragrances is that as of 1 January 2020 manufacturers of cleaning products must share online a list of all fragrance ingredients and EU allergens that are present in a product at a concentration at and above 0.01% (100 ppm), and fragrance ingredients at any concentration included on 22 designated lists and a list of 34 non-functional constituents. The regulation requires that starting in 2023, any ingredients with a California Proposition 65 warning must be disclosed.

The newly enacted California Cosmetic Fragrance and Flavor Ingredient Right to Know Act of 2020 requires that starting 1 January 2022, cosmetic product manufacturers must disclose on the California Department of Health web portal: fragrance allergens included in the EU Cosmetic regulation at and above 0.01% (100 ppm) for rinse off products and 0.0010% (10 ppm) for leave on products, and any fragrance or flavor ingredients present on 22 designated lists of substances of concern.

Fragrance and Flavor disclosures: our new communication tool

Fragrance and flavor development is already governed by rigorous standards, but there still remains a desire for even more information, especially about product ingredients that have been long considered confidential. To respond to this need, we are taking action beyond what is required by regulations to share publicly the ingredients in our flavor and fragrances. And this is the core of our **F&F Share for Good** transparency program. The initiative kicked off with fragrances at the start of 2020, and we began to add flavors later that year. Such voluntary initiative offers open communication to the people who use our products. It promotes

awareness of fragrances and flavors and encourages consumers to learn more about them. The opportunity to see what is in the products will help shoppers make assessments based on health concerns and take informed decisions about purchases.

Our **F&F Share for Good** program is built on three main pillars:

Guiding principles

The guiding principles are deeply rooted in the company's sustainability values to use ingredients that are safe for the people and the environment and meet strict safety standards and applicable regulations. The initiative is aligned with compliance requirements and consumers' desire for greater transparency.

Disclosure Policy

The disclosure policy is our transparency rules thoughtfully crafted to ensure data consistency, accuracy and accessibility. It defines our systematic approach to transparency: for all brands we are providing consumers the ingredients in their fragrances and flavors down to 0.01% (100 parts per million) in each product, including allergens. These are provided with consistent material naming and listing in alphabetical order. The information will be very easy to access via brand websites or the well recognized US consumer goods digital platform Smart Label. To connect the dots from the ingredient name to additional information is just a click away.

Implementation Plan

Our implementation plan maps the journey that takes us to the successful roll out and the implementation of this exciting program. It starts with a legal agreement between the company and the creators that allows us to publicly disclose information that is considered confidential. Next comes the extensive review of hundreds of formulas to gather product specific fragrance and flavor details and exchange information with suppliers. The final steps are disclosure preparation and digital publishing.

If you are curious to explore our flavor and fragrance journey, Europe can be one of your destinations. On Colgate oral care websites you can find, along with toothpaste and mouthwash ingredients and their respective function, the list of aroma ingredients that are contained at 0.01% (100 ppm) or greater listed in alphabetical order. And browsing the universe of Sanex – our brand for advanced skin care solutions, you can find the disclosure of the fragrance ingredients organized in a similar way. If you travel to the US, you can find the ingredients of scent and taste revealed on the Smart Label product pages for your favorite toothpaste or mouthwash. For home care products, the disclosure of the fragrance ingredients has to provide the information not only to follow our well defined internal policy but also to meet the requirements of the California Cleaning Product Right to Know Act. Finally, to stay true to its ingredients Stewardship model, our Tom's of Maine brand has also embraced **F&F Share for Good** program to provide on their website the flavor and fragrance ingredients to the 100 ppm level.



Disclosure of Fragrance and Flavor ingredients is happening. It has been very exciting for us as a company to be active participants in the fragrance transparency initiative and expand it even further to share flavor ingredients. **F&F to Share for Good** has become our rallying cry to always stay true to the people who love our products. ■



Ms. Catalina Monroy is a Vice President of the Colgate-Palmolive Company, providing global leadership to the team responsible for developing and recommending world-class flavors and fragrances that ensure the best tasting and smelling experience to the consumers. Her team support Colgate's Global Research & Development organization by developing and recommending flavors and fragrances for all Oral Care, Home Care and Personal Care Colgate-Palmolive brands.



Mania Bankova brings 15 years of experience in analysis of flavors, flavor materials, essential oils, flavor R&D for oral care products and most recently fragrances for consumer goods. Prior to that, she worked in academic research.

Mania has a strong background in organic synthesis and instrumental analytical chemistry. Driven by her passion for continuous exploration and embracing new challenges, recently she is expanding her expertise in the field of flavor and fragrance regulations.