Health & Safety Department

(Registration & Permits Section)

Document Title	**Technical Guidelines for Fragrance Products**
Document Code	DM-HSD-GU117-FP2
Version #	V 2.0
Issue Date	4th May 2024
Superseded Issue Date	06th Jan 2022

Document History Log

Any modification to the document must be reviewed and approved
as per the corporate policies and procedures of document control

Version #	Date	Prepared/reviewed by	Modifications summary
V 1.0	06th Jan 2022	Registration & Permits Section	Issue - Version 1
V 2.0	4th May 2024	Registration & Permits Section	Adding the new logo of both Dubai Government & Dubai Municipality

Table of Content

1. Introduction 4

2. Purpose 4

3. Legislations 4

4. Definitions 5

5. Scope & Fragrances Classifications 6

5.1 Products Categories /Classification 6

6. Registration of Fragrance products 7

6-1 Criteria of Applicant: 8

6-2 Responsibility of Applicant: 8

6-3 Amendments or Change in Registration Particulars: 9

6-4 Validity of Product Registration: 9

6-5 Advertisement: 9

6-6 Product Recall & Withdrawal: 9

6-7 Violations & Penalty: 9

7. Required Documents for Registration of Fragrance product (Product Dossier) 10

7.1 Product artwork: 10

7.2 Ingredient report: 10

7.3 GMP (Good Manufacture Practice) Certificate: 10

7.4 Free Sale Certificate (FSC): 11

7.5 Laboratory Test Report: 11

8. Label Requirements: 12

8.1 General Label requirements: 13

8.2 Hotel amenities and Business to Business (B2B) products : 13

9. References 14

1. Introduction

Dubai Municipality, Health & Safety Department prepared this guideline based on Local Order No. 11, 2003.

The purpose of this guideline is to improve the free movement of Fragrance products within Dubai, while ensuring a high level of safety and protection of human health.

2. Purpose

The purpose of this guideline is to improve the functioning of Dubai market through the harmonization of the rules on the making available on the market and the use of Fragrance products, while ensuring a high level of protection of both human health and the environment.

Fragrance products should neither be made available on the market nor used unless authorized in accordance with this Regulation.

3. Legislations

It is difficult for Dubai Municipality to perform its duties and specialties as an institutional organization without having a legislative system that regulates its activities, draws the framework of its relationship with the local community and gives legitimacy to its actions. Therefore, the decree issued regarding the municipality foundation has contained a provision on giving it the authority and power to issue orders, regulations, and decisions. Current legislative law that applies to Fragrance products found in: Legislative order No. 30/2007 and local order No. 11/2003 concerning Public Health and Safety of the society in the Emirate of Dubai.

4. Definitions

Definition	Meaning
Fragrance Product	Any product that emits a pleasant odor and consists of essential oils, stabilizers, alcohol, water, permitted colors, antioxidants, and solvents.
Manufacturer	A company engaged in producing fragrances, including processing, mixing, packaging, and labeling.
Ingredient:	An ingredient means any substance that is one of the components of a fragrance product and includes water, alcohol, fragrances, and oils.
Allergens	An allergen is a substance that can trigger the immune system to release chemical substances such as antibodies that result in allergy symptoms. Most fragrances contain allergens in their production.
Aromatherapy or essential oils	Refers to a range of traditional, alternative, or complementary therapies that use essential oils and other aromatic plant compounds
Substance	A chemical element and its compounds in the natural state or obtained by any manufacturing process, including any additive necessary to preserve its stability and any impurity deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition.

5. Scope & Fragrances Classifications

5.1 Products Categories /Classification

- **Eau de Perfume (EDP):**

  Eau de perfume generally has a fragrance concentration of between 15% and 20%. They have high concentration of alcohol than perfumes and last longer.

- **Eau de Toilette (EDT):**

  Eau de toilette (EDT) has a fragrance concentration of between 5% and 15% with shorter lasting duration.

- **Cologne:**

  Cologne has a much lower concentration of fragrance than the above types of perfume. Cologne generally has a 2% to 4% percent concentration of fragrance and a high concentration of alcohol. This makes cologne the least duration to persist.

  Figure 1 : illustrates the comparison of some fragrances with difference in the fragrance concentration and duration of lasting of each.

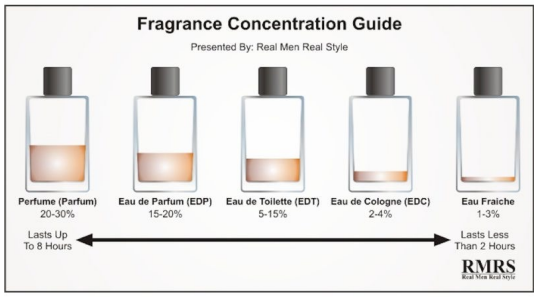


Figure 1

- **Splash - Body Mist:**

  A Body mist is a lighter version of perfume. They are softer, with a less concentrated and more delicate smell. They do not last as long as perfumes. Mainly consumers use body mist over perfumes if less scent is required such as after shower or if the consumer has allergy to strong fragrances.

- **Aftershave:**

  Aftershave is any kind of liquid, oil, gel, or other substance meant to be put on your body after shaving. Using aftershave is a ritual for many people especially for men.

- **Concentrated oils:**

  Naturally extracted oils from flowers, woods, spices, etc. As the name suggests, these are concentrated oils, which do not contain any additives like alcohol during its production. This in turn makes them very much stronger than any of the other perfume sprays does.

- **Air Fresheners / Home Fragrances:**

  Consumer products that typically emit fragrance and are used in homes or commercial interiors such as restrooms, foyers, hallways, vestibules, and other smaller indoor areas, as well as larger areas such as hotel lobbies, auto dealerships, public arenas, and other large interior spaces.

- **Diffusers:**

  It is used to fill the air in a room with tiny, breathable particles of beneficial essential oils-giving the room a calmer, more pleasant-smelling ambience.

- **Scented Candles:**

  It consists mainly of fragrant oils mixed into the wax, gives off a pleasant aroma when burning. A scented candle can be placed in a bathroom, living room, in a bedroom, or any room of the house.

6. Registration of Fragrance products

Since consumer safety is the primary principle of fragrance registration, its process allows the Registration and Permits Section to gather adequate information to assess the safety of fragrance products. It is necessary to emphasize that no fragrance product shall be manufactured, imported, exported, advertised, sold, or distributed in Dubai unless it has been registered in Montaji system in accordance with Dubai Municipality regulation.

According to Local Order No. 11 / 2003. Dubai Municipality regulates the manufacture and sale of fragrance product by requiring that all fragrance products to be registered prior to placing in Dubai

market; as well by requiring the individuals running the activities related to fragrance manufacturing, filling , mixing or packing to be licensed in Dubai.

❖ <u>To apply for the service:</u>

- Login to www.montaji.dm.gov.ae
- Choose Services
- Consumer Product Registration Service (Montaji)
- Run Service.

Individuals who locally manufacture fragrance products in Dubai are advised to contact the Registration & Permits section for proper registration of the products to take the necessary steps to ensure that fragrance products intended for the Local market are registered before the manufactured products are placed into Dubai market.

6-1 Criteria of Applicant:

Applicant for product registration should own any of the below licenses with related activity to fragrance:

- A Commercial License issued from any local authority inside UAE and should include related activity to fragrance trading.
- An Industrial License issued from any local authority inside UAE and should include related activity to fragrance manufacturing.
- Tajer license issued by Abu Dhabi Department of Economic Development (AD, DED).
- Intelaq license issued by Dubai SME to run a business from home in various fields.
- E-Trader license issued by Dubai DED for business activities through various social media networks.

6-2 Responsibility of Applicant:

- The applicant shall be responsible for the product, its safety, performance, and all information supplied in support of his application for registration of the product.
- The Fragrance placed on the market locally made in Dubai with certain aspects, requirements and authorized to certain licenses must not cause damage to human health when applied under normal or reasonably foreseeable conditions of use, taking account, in particular, of the product's presentation, its labeling, instructions for its use and disposal, warning statements as well as any other indication or information provided by the person responsible for placing the product on the market.

- The provision of such warnings shall not, in any event, exempt any person from compliance with the other requirements laid down in this Guideline.

6-3 Amendments or Change in Registration Particulars:

After a Fragrance Product has been registered, any subsequent amendment in particulars of the application relating to the Fragrance must be notified or approved by the Registration and Permits Section.

6-4 Validity of Product Registration:

The registration of a Fragrance product shall be valid for 5 years as extension for renewal to be reviewed.

6-5 Advertisement:

Any related advertisement or promotional activity needs pre-approval through (Montaji system), for example: brochures, newspaper& magazines, promotional campaigns, social media, TV & media, outdoor and indoor advertisements.

6-6 Product Recall & Withdrawal:

The product recall & Withdrawal is promptly and efficiently retrieving Batch/ Bar Code of the product that does not comply with health and safety requirements, or that may have an undesirable effect on consumers. Recalls & Withdrawal can be initiated at the request of the Dubai Municipality, or other relevant authorities to recall the product.

6-7 Violations & Penalty:

Individuals who contravene any of the provisions of the guidelines and regulations will be charged as violated by Local Order No. (11) of 2003 concerning public health and safety of the society in the emirate of Dubai.

7. Required Documents for Registration of Fragrance product (Product Dossier)

To proceed with registration of a fragrance product with Dubai Municipality – Health & Safety Department – Registration & Permits Section, the product must fulfill all the below documents:

7.1 Product artwork:

It should illustrate all the related information, including brand name, product name, size/weight of the product, manufacturer details, direction and indication of use, ingredients, and barcode number.

7.2 Ingredient report:

A document to declare in detail all the ingredients in chemical name and Chemical Abstracts Service CAS (for chemical ingredient only, e.g., preservatives etc.) with the exact concentration in percentage of each ingredient. It should also include all allergens mentioned in the ingredients report with a concentration of more than 0.001%.

The ingredients report certificate must be signed and/or stamped by the manufacturer.

7.3 GMP (Good Manufacture Practice) Certificate:

This certificate is mandatory only for products manufactured inside UAE. It is a system for ensuring that products are consistently produced and controlled according to quality standards. It is designed to regulate the production, verification, and validation of manufactured products and ensure that they are effective and safe for market distribution.

In fragrance registration, the manufacturer should possess the ISO 22716 (GMP) certificate for the manufacturing of perfumes and fragrances scope.

7.4 Free Sale Certificate (FSC):

This certificate is mandatory for all products manufactured outside the UAE. A free sale is a certificate stating that the product is manufactured and can be freely/safely sold in the market of the country of origin and should be attested by any government authority at the country of origin.

7.5 Laboratory Test Report:

Tests can be requested to ensure the safety and quality of the product applied.

Table 1 summarizes the tests applicable for Fragrance products.

Test Description	Specification limit
Perfumes , Toilet Waters, Eau de Cologne	
Allergens	No maximum limit: allergens equal to or above the below limits should be indicated on the label (within the ingredients) as follow: — 0,001 % in leave-on products — 0,01 % in rinse-off products
Bitrex	All products: Absent
Turbidity & Visual inspection	
Solvents (Ethanol, Propan-1-ol and Diethyl Phthalate), Water and Essential Oil Content	No maximum limit
Methanol	All products: Absent

*Note: All the specification limit should be updated/revised as per the update in the regulation/standard

Note:

Any other laboratory test may be asked to be submitted upon a request from Registration and Permits section / Health & Safety departments as per status of product, and to consider the followings:

- All laboratory tests to be done by accredited laboratory either in the country of origin or from any accredited laboratories.
- For the accredited laboratories in United Arab Emirates: please visit the Emirates International Accreditation Center website / http://www.eiac.gov.ae/en/Pages/default.aspx

- For the Accredited laboratories worldwide: please visit the international organization for accreditation bodies website / https://ilac.org/about-ilac

Table 2 summarizes the 26 allergens found in fragrances.

S.No	List of Allergens	CAS.NO
1	Alpha Isomethyl Ionone	127-51-5
2	Amyl Cinnamal	122-40-7
3	Amyl Cinnamyl Alcohol	101-85-9
4	Anise Alcohol	105-13-5
5	Benzyl Alcohol	100-51-6
6	Benzyl Benzoate	120-51-4
7	Benzyl Cinnamate	103-41-3
8	Benzyl Salicylate	118-58-1
9	Cinnamal	104-55-2
10	Cinnamyl Alcohol	104-54-1
11	Citral	5392-40-5
12	Citronellol	106-22-9
13	Coumarin	91-64-5
14	Eugenol	97-53-0
15	Evernia Furfuracea (Treemoss) Extract	90028-67-4
16	Evernia Prunastri (Oak Moss) Extract	90028-68-5
17	Farnesol	4602-84-0
18	Geraniol	106-24-1
19	Hexyl Cinnamal	101-86-0
20	Hydroxy Citronellal	107-75-5
21	Isoeugenol	97-54-1
22	Lilial	80-54-6
23	Limonene	5989-27-5
24	Linalool	78-70-6
25	Lyral	31906-04-4
26	Methyl 2-Octynoate	111-12-6

8. Label Requirements:

Label requirements should be available and fulfilled before being placed on the market. Fragrance products should be in the proper size/shape to include all required details to meet consumer satisfaction & awareness, otherwise, this may achieved, for example, by using swing tags, leaflets, brochures, etc.

8.1 General Label requirements:

The followings are the required components that must be declared in clear English and/or Arabic language:

- **Brand Name:** A trademark or trade name.
- **Product Name**: A trademark or trade name cannot be used to replace the name of Fragrance Products.
- **Manufacturer detail**: Name, Address, Web address of Manufacturer or Agent acting in UAE.
- **Country Of Origin:** should be clearly indicated to avoid any misleading for the customers, should be clearly mentioned as Made in , Manufactured in , Packed in United Arab Emirates .
- **Ingredients:** The identity of each active ingredient with concentration in metric units.
- **Allergens:** For perfumes, all allergens should be listed on the product label. There are 26 allergens commonly used in fragrance products. The International Fragrance Association (IFRA) classified allergens with the allowed limit of each allergen expressed in the ingredients report.
- **Size or Weight of the product:** Must be clearly indicated on the product in metric units.
- **Production & Expiry Dates:** Must be clearly indicated on the label using non-removable printing or non-removable stickers.

  Note:

  Period after Opening (PAO) could be considered instead of expiry date according to the product type.
- **Storage Condition:** To be clearly indicated mentioning any other specific storage conditions than normal if any.
- **Instruction of Use:** To be clearly indicated unless it is clear from the product name or presentation.
- **Identification Code:** (Barcode) to be clear and unique for each product.
- **Batch Number:** batch or Lot identification number to be indicated clearly on the label.
- **Warnings:** proper warning signs should be present on the artwork label. For example, flammable sign in pressurized aerosol.
- **Inconsistent Illustrations:** Pictures and illustrations that are inconsistent with the prevailing social customs and values shall not be used.

8.2 Hotel amenities and Business to Business (B2B) products :

A fragrance may be applied for use in hotel amenities or business use.

All products that are intended for use by hotel guests or for companies that are trading for their products to other companies only without being placed in the market can be registered through montaji.

Such products can be registered without having a barcode on the artwork label.

9. References

- Local Order No. (11) of 2003 concerning public health and safety of society in the Emirate of Dubai.
- IFRA 49th Amendment End of Consultation Letter (November 18, 2019)
- IFRA 49th Amendment End of Consultation Letter (Att. 01) IFRA Consultation Letter
- Cabinet legislation No. (5) of 2014 Concerning the UAE System for the Control of Perfume products.
- Annex III of the European Union Cosmetics Directive External Link Disclaimer
- Cosmetics Regulation (EC) No 1223/2009

For (suggestions, comments, and complaints)	For further information
▪ Unified interactive platform that connects Dubai Government and its customers: The 04 Platform https://04.gov.ae/ ▪ ✆ Dubai Municipality - Call Center (24/7): 800900	▪ ✉ montaji@dm.gov.ae ▪ ✆ Dubai Municipality - Call Center (24/7): 800900