

AMERICAN MEDICAL ASSOCIATION HOUSE OF DELEGATES

Resolution: 912
(I-23)

Introduced by: Medical Student Section

Subject: Fragrance Regulation

Referred to: Reference Committee K

Whereas, fragrances include many contact allergens, irritants, cross-reactors, or other substance or natural extract often found in personal care products, cosmetics, household products, drugs, and wound care products¹⁻¹¹; and

Whereas, individuals with fragrance sensitivity experience adverse effects after exposure, especially patients with allergies, asthma, eczema, lung disease, and migraine^{1,2-26}; and

Whereas, due to wide use, fragrances are the most common cause of contact allergy and lead to debilitating systemic dermatologic, neurologic, and immunologic side effects¹²⁻¹⁶; and

Whereas, large surveys show that over 30% of individuals may experience fragrance sensitivity, 50% prefer that healthcare facilities be fragrance-free, and 7% lose workdays due to workplace fragrance exposure^{1,11-14}; and

Whereas, fragranced products can lower both indoor and outdoor air quality by releasing hazardous air pollutants that contribute to diseases and illness^{1,5,8,14,22}; and

Whereas, the severity of fragrance sensitivity often meets Americans with Disabilities Act (ADA) criteria for a disability ("physical or mental impairment that substantially limits one or more major life activities") and may be considered an "invisible disability" ("impairment...not always obvious to the onlooker")³⁰⁻³²; and

Whereas, *Core v. Champaign County Board of County Commissioners* (2012) and *McBride v. the City of Detroit* (2009) found that severe fragrance sensitivity can be an invisible disability, leading Detroit to add a fragrance-free policy to their employee ADA handbook³³⁻³⁴; and

Whereas, fragrance-free policies are recommended by the Centers for Disease Control and Prevention, the American Lung Association, and the US Department of Labor Office of Disability Employment Policy and are in place in multiple healthcare facilities, workplaces, schools, and other organizations across the US³⁵⁻³⁹; and

Whereas, the US Food and Drug Administration and US Consumer Product Safety Commission do not currently regulate fragrances^{2,40-45}; and

Whereas, the European Union has already banned nearly 1,400 chemicals from cosmetics and required premarket safety assessments, mandatory registration, and government authorization for the use of certain materials, compared to only 30 chemicals in the US⁴⁶⁻⁴⁸; therefore be it

1 RESOLVED, that our American Medical Association recognize fragrance sensitivity as a
2 disability where the presence of fragranced products can limit accessibility of healthcare settings
3 (New HOD Policy); and be it further
4

5 RESOLVED, that our AMA encourage all hospitals, outpatient clinics, urgent cares, and other
6 patient care areas inclusive of medical schools to adopt a fragrance-free policy that pertains to
7 employees, patients, and visitors of any kind (New HOD Policy); and be it further
8

9 RESOLVED, that our AMA work with relevant parties to advocate for governmental regulatory
10 bodies, including but not limited to the Occupational Safety and Health Administration (OSHA),
11 the Centers for Disease Control and Prevention (CDC), and the National Institute for
12 Occupational Safety and Health (NIOSH) to recommend fragrance-free policies in all medical
13 offices, buildings, and places of patient care (Directive to Take Action); and be it further
14

15 RESOLVED, that our AMA work with relevant parties to support the appropriate labeling of
16 fragrance-containing personal care products, cosmetics, and drugs with warnings about
17 possible allergic reactions or adverse events due to the fragrance, and advocates for increased
18 categorization in the use of a "fragrance free" designation (Directive to Take Action); and be it
19 further
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21 RESOLVED, that our AMA supports increased identification of hazardous chemicals in
22 fragrance compounds, as well as research focused on fragrance sensitivity in order to remove
23 these allergens from products applied to one's body. (New HOD Policy)

Fiscal Note: Moderate - between \$5,000 - \$10,000

Received: 09/27/2023

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RELEVANT AMA POLICY

H-440.855 National Cosmetics Registry and Regulation

1. Our AMA: (a) supports the creation of a publicly available registry of all cosmetics and their ingredients in a manner which does not substantially affect the manufacturers' proprietary interests and (b) supports providing the Food and Drug Administration with sufficient authority to recall cosmetic products that it deems to be harmful.
2. Our AMA will monitor the progress of HR 759 (Food and Drug Administration Globalization Act of 2009) and respond as appropriate. [BOT Action in response to referred for decision Res. 907, I-09; Reaffirmed in lieu of: Res. 502, A-17]