

## REACH

# Formaldehyde. ECHA calls for industry evidence



Prepared by: Stuart Cochrane - Sustainability Consultant

Date: 8 February 2018

#### FIRA International Ltd 2018

The material contained in these REACH Awareness materials is intended for information purposes only. FIRA International Ltd. endeavours to ensure that information provided is as accurate as possible and is updated on a regular basis. Nevertheless, FIRA International Ltd. makes no representations or warranties to the completeness of accuracy of any of this information. Correspondingly, FIRA International Ltd. will in no event be responsible for financial or other losses incurred resulting from the use of or reliance on information provided. Therefore, it should be recognised that before embarking on any action further professional advice should be sought and/or consultation taken with the relevant regulatory authority.



#### Formaldehyde. ECHA calls for industry evidence



#### **Version Control**

Any amendments or revisions made to this document are recorded here:

Version No.	Date	Author	Details of Amendments
1.0	08/02/18	S Cochrane	

FIRA International Ltd 2018 Page 1

## REACH

#### Formaldehyde. ECHA calls for industry evidence



#### Introduction

Uncertainty exists as to how the UK's EU referendum result ("Brexit" vote) will impact the prevailing chemicals legislation which includes REACH, Classification, Labelling and Packaging (CLP) and the Biocidal Products Regulation (BPR).

For now the relevant EU legislation continues to apply. It is also unlikely the UK will exit the EU before the 2018 REACH registration deadline. REACH is a complex system of EU Regulations concerning chemicals affecting the entire supply chain from manufacturers to importers and their customers.

Following a European Commission request on 20<sup>th</sup> December 2017, ECHA has started preparing an Annex XV restriction dossier according to Article 69(1) on the use of formaldehyde and its releasers in articles and in mixtures in concentration <0.1% by consumers. ECHA has made an entry in the Registry of Intentions (RoI) on 11<sup>th</sup> January 2018 with an anticipated submission date of 11 January 2019.

#### **FORMALDEHYDE**

CAS Number 50-00-0

Formaldehyde has been classified as harmful to human health. The current harmonised classification for formaldehyde according to CLP Regulation (Regulation EU No 1272/2008) is Carcinogenic 1B with concentration limit of ≥0.1%, Mutagenic 2, Acute Toxicity 3 via inhalation, contact with skin or oral ingestion, Skin Sensitiser 1 and Skin Corrosive 1B.

Formaldehyde is widely used in the EU/EEA by consumers, in articles, by professional workers, in formulation or re-packing, at industrial sites and in manufacturing. It is registered under REACH in volumes exceeding one million tonnes per year.

Formaldehyde is commonly used in the furniture industry and is present in many contract and domestic products. It is often used in the form of urea-formaldehyde resin in the manufacture of medium density fibre board and plywood. Production of formaldehyde resins is estimated to be around half of all formaldehyde consumption.

#### **CALL FOR EVIDENCE**

ECHA has started the consultation on 11<sup>th</sup> January 2018 with a call for evidence on the use of formaldehyde and formaldehyde releasers in mixtures or in articles. This is an important opportunity for all furniture industry stakeholders to contribute evidence of the impacts of further restrictions of the use of formaldehyde within the EU.

FIRA International Ltd 2018 Page 2

The material contained in these REACH Awareness materials is intended for information purposes only. FIRA International Ltd. endeavours to ensure that information provided is as accurate as possible and is updated on a regular basis. Nevertheless, FIRA International Ltd. makes no representations or warranties to the completeness of accuracy of any of this information. Correspondingly, FIRA International Ltd. will in no event be responsible for financial or other losses incurred resulting from the use of or reliance on information provided. Therefore, it should be recognised that before embarking on any action further professional advice should be sought and/or consultation taken with the relevant regulatory authority.

## REACH

#### Formaldehyde. ECHA calls for industry evidence



The objective of the call is to gather information from relevant stakeholders on any use of formaldehyde in mixtures for use by consumers in concentration < 0.1%, in articles and use of formaldehyde releasers in mixtures by consumers and in articles, possible releases of formaldehyde from articles and its source.

Evidence relating to the technical and economic implications of setting up limits of emissions for formaldehyde released from articles and for formaldehyde contained in mixtures used by consumers below the classification limits of 0.1%. is also welcomed.

ECHA have requested evidence from a variety of industry groups that includes formulators of mixtures containing formaldehyde and formaldehyde releasers, manufacturers and importers of articles, suppliers and distributors of mixtures and articles containing formaldehyde and/or formaldehyde releasers.

Trade associations and any other stakeholder or Member State Authority holding information on formaldehyde and formaldehyde releasers should use this opportunity to submit evidence.

#### Comments can be submitted at:

https://comments.echa.europa.eu/comments cms/CallForEvidence.aspx?RObjectId=fwiuwy13070ehlak h173

Submission deadline for evidence: 23:59 11th April 2018

FIRA International Ltd 2018 Page 3