



NEWSLETTER  
JULY 2018

Dear Formacare members,

I am delighted to share with you the first newsletter since I became Secretary General in February.

A lot has happened since the last issue was sent: The European Chemicals Agency (ECHA) registered its intention to restrict formaldehyde in consumer articles in January, and in April, the European Commission published its proposal for the third review of the Carcinogens and Mutagens directive, including formaldehyde. In addition, France aligned their recommendations for formaldehyde to WHO's limits. Formacare has been hard at work together with our downstream users and other partners.

I would like to take the opportunity to thank all of you for the first months in my position which has, so far, been quite exciting. I hope you enjoy this newsletter and encourage you to closely follow all the activities undertaken by Formacare. Do not hesitate to contact me if you have any feedback or suggestions.

All the best,

Jonathan Crozier

## REGULATORY UPDATES

### Commission proposal for CMD review

In April 2018, the European Commission [published](#) their proposal for the third review of the Carcinogens and Mutagens Directive. The proposal included proposed occupational exposure limits (OELs) for formaldehyde, among 4 other substances.

Formacare initiated a follow-up of the discussions we first had with the social partners in 2016. As a result, ECEG, IndustriAll and ETUC aligned with Formacare: the Commission proposal was found agreeable to all. As a result, “the formaldehyde value chain” signed a [letter](#) to emphasize strong support in favour of the Commission proposal.

The text follows recommendations from the Scientific Committee on Occupational Exposure Limits ([SCOEL](#)). Formacare agrees that harmonised and binding OELs across member states would be the most efficient choice.



From:  
*Jonathan Crozier, Formacare Secretary General*  
*Sylvain Lefebvre, IndustriAll Deputy General Secretary*  
*Esther Lynch, ETUC Confederal Secretary*  
*Emma Argutyán-Kahlmeyer, ECEG Secretary General*

[CMD iii Feedback Consultation: Formaldehyde value chain alliance supports COM proposal](#)

Formacare will share its position with the Members of the European Parliament (MEPs) in charge of the dossier within the Employment and Social Affairs committee of the European Parliament. The group has already met Laura Agea (the rapporteur)’s advisors and with the staff of the shadow rapporteur of the European People’s Party (EPP), Claude Rolin.

The draft report will be presented on July 11 in the Committee and the deadline for amendments is 4 September, while the vote is expected to take place in the EMPL committee in October. The Parliament’s position is likely to be finalised in the autumn, after which the Council of Member States, the Commission and the Parliament will hold trilogue discussions to agree on the final text. Eventually, the third batch of the CMD should be fully adopted by early 2019.

### **Parliament timeline:**

**29/06** – Draft [report](#) published

**11/07** – Presentation of report in the Committee of Employment and Social Affairs ([EMPL](#))

**04/09** – Deadline for amendments

**18/10** – Vote in EMPL

**TBC** – Vote in Plenary

### **Relevant MEPs:**

**Rapporteur:** [Laura Agea](#) (EFDD)

#### **Shadow rapporteurs:**

[Claude Rolin](#) (EPP)

[Marita Ulvskog](#) (S&D)

[Enrique Calvet Chambon](#) *tbc* (ALDE)

[Anthea McIntyre](#) *tbc* (ECR)

[Karima Delli](#) (Greens/EFR)

#### **Opinion rapporteurs:**

ENVI: [Joelle Melin](#) (ENF)

JURI: [Jiri Mastalka](#) (GUE/NGL)

## **Restriction intention for formaldehyde: Formacare replied to ECHA**

A restriction [intention](#) for formaldehyde and formaldehyde releasers in mixtures and articles for consumer uses was submitted by the European Chemicals Agency (ECHA) on 11 January 2018. The restriction proposal is likely to be submitted in January 2019.

ECHA has completed the hazard assessment of the restriction process, based on the information received during the call for evidence. Formacare coordinated input from the lead registrant (BASF), downstream users (EPF, Tegewa) and member companies to build up a central file for the ECHA call for evidence. Formacare's joint submission was well received and its quality was acknowledged.

Together with downstream users, Formacare met with ECHA in June, along with representatives from the Dutch National Institute for Public Health and the Environment (RIVM), which oversees the substance evaluation.

ECHA requested information regarding wood panels and other products such as paints and inks. For the upcoming socio-economic evaluation, ECHA indicated that they would use data from the Indoor Air study conducted by Dr. Tunga Salthammer ([Fraunhofer Institute](#)) on behalf of the REACH Consortium (to be published).

## **CMR in textiles**

A separate [restriction](#) of CMR substances in textile articles and clothing for consumer use under REACH was published on 8 February 2018, covering several substances including formaldehyde. Formacare is collaborating with [Tegewa](#) (German Textile association) to ensure effective follow-up.

## Methanol duty suspension to be renewed

The current 5-year duty suspension on methanol imports to the EU will come to an end. The UK filed for a renewal of duty suspension in early 2018. However, in May 2018, the Netherlands objected to this renewal, based on argumentation provided by BioMethanol Chemie Nederlands BV ([BioMCN](#)).

Following an exchange of views with member companies, Formacare recommended to lift this objection. A 5,5% duty on methanol imports could have cost up to \$192 million per year, on the basis of a \$550/ton methanol. BioMCN's would have put methanol supply (and thus, production of formaldehyde) in jeopardy in the EU.

This objection has since been withdrawn, confirmed in a recent meeting with European Commission's DG TAXUD. **Methanol imports should therefore continue to be exempted from duty** for the next five years, pending confirmation from the workgroup's third meeting, scheduled for this autumn.

## France adapts formaldehyde recommendations

France's Agency for Food, Environmental and Occupational Health and Safety ([ANSES](#)) increased its guidance values for indoor air ([VGAI](#)) to follow the World Health Organisation's ([WHO](#)) recommendations on formaldehyde: 100µg/m<sup>3</sup>.

ANSES also raised its long-term Derived No Effect Level (DNEL) to 0.3ppm for worker exposure. Below is a summary of the recommendations:

ANSES proposals	Type of value	Critical effect (key study)	Critical concentration	UF	Limit value
<b>OEL (workers)</b>	VLEP-8h	Eyes irritation (Lang and al., 2008)	NOAEL = 369 µg/m <sup>3</sup>	/	350 µg/m <sup>3</sup> (=0,3 ppm)
	VLCT-15 min		NOAEL = 738 µg/m <sup>3</sup>	/	700 µg/m <sup>3</sup> (=0,6 ppm)
<b>DNEL (workers)</b>	DNEL long term		NOAEL = 369 µg/m <sup>3</sup>	/	350 µg/m <sup>3</sup> (=0,3 ppm)
	DNEL short term		NOAEL = 738 µg/m <sup>3</sup>	/	700 µg/m <sup>3</sup> (=0,6 ppm)
<b>VTR</b>	VTR chronic		NOAEL = 369 µg/m <sup>3</sup>	3	VTR chronic = VTR acute = 123 µg/m <sup>3</sup>
	VTR acute				
<b>VGAI</b>	VGAI short term				100 µg/m <sup>3</sup>

## WHAT'S NEW FROM FORMACARE?

### Scientific and toxicological WG

On 2-5 September, [EUROTOX 2018](#) will take place in Brussels. Dr. Edgar Leibold from BASF will present a poster on the Swenberg study on 3 September.

### Polyols WG

The oxo chemicals producer [OXEA](#) has announced that they will increase their European production capacity for neopentyl glycol (NPG).

### Downstream Users WG

The next meeting will take place on **11 September** in Brussels

### Aminoplast glues and resins WG

The next meeting will take place on **11 September** in Brussels

## APPLICATION HIGHLIGHT

Formaldehyde is widely used in the [automotive sector](#) and a key component for achieving the goals set out in the mobility (Europe on the Move) [strategy](#) currently under discussion.

For example, phenol formaldehyde (PF) resins have high moisture and chemical resistance as well as high heat resistance. These properties make phenol resins ideal for under-the-hood moulded automobile components such as engine, transmission and brake parts – keeping cars, drivers and electrical component safe, and ensuring that the individual parts last long and perform well.

### AUTOMOTIVE



**FUEL SYSTEM COMPONENTS**

- Pump housings
- Filters
- Impellers
- Reservoirs
- Senders
- Gas caps

**UNDER THE HOOD**

- Molded components
- Engine & metallic parts
- Automatic transmission parts
- Carburetor floats

**EXTERIOR**

- Exterior primer, clear coat and trim
- Tire cord adhesive
- Bumper

**INTERIOR**

- Seats
- Steering wheel
- Interior trim
- Brake pads
- Dashboard and fascias
- Instrument knobs
- Hooks, fasteners, clips
- Locks
- Speaker grilles
- Trunk release lever
- Door handles
- Door panels
- Window cranks
- Seatbelt buckles
- Windshield wiper parts
- Cup holders
- Head rests

Source: [www.formacare.org/automotive](http://www.formacare.org/automotive)