

Client Alert

International Trade/WTO, EHS, and FDA & Life Sciences Practice Groups

July 21, 2016

European Chemical Agency Publishes Call for Evidence on the Use of Formaldehyde Releasers

On July 6, 2016, the European Chemicals Agency (ECHA) issued a [call for evidence](#) from relevant stakeholders to gather information on the uses of formaldehyde releasers. ECHA intends to issue a report to inform the Commission's decision as to whether it should prepare a restriction dossier under [Annex XV of the Registration and Authorization of Chemicals \(REACH\)](#). ECHA is requesting information from stakeholders on uses, tonnages, emissions, and exposures of the formaldehyde releasers listed in Tables 1, 2, and 3 of the [document](#), as well as requesting information on any other potential formaldehyde releasers identified by stakeholders.

Formaldehyde releasers include any chemical compound that slowly releases formaldehyde. Of note, Table 1A ("Chemicals for which adequate clinical data are available to identify them as formaldehyde-releasers beyond doubt") contains several ingredients commonly used as preservatives in cosmetics, for example: Quaternium-15, Ureas, DMDM Hydantoin, Sodium hydroxymethylglycinate (INCI) (also used as a softener for hair care products). Thus, the ECHA's analysis could be important in informing and potentially influencing future efforts to restrict the use of these ingredients in such products. Table 2 contains a list of "Formaldehyde releaser(s) for which the Committee for Risk Assessment has adopted opinions on harmonised classification," and Table 3 contains a list of "Formaldehyde releasers in the biocidal review." **Comments on the "Call for Evidence" document are due on September 27, 2016.**

The ECHA's call for evidence also is notable within the larger context of efforts to consider formaldehyde. In 2013, France and the Netherlands began evaluating the effects of formaldehyde under the Community Rolling Action Plan (CoRAP), identifying concerns with production volume, wide-spread use, and carcinogenicity, mutagenicity, and reprotoxicity (CMR), as well as worker exposure. Based on the results of that evaluation, ECHA separately decided on October 6, 2015 to request that *registrants* of formaldehyde provide further information concerning

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the production and use of formaldehyde. **The deadline for submission of information to ECHA on the CoRAP is October 13, 2017.**

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