Berlin, 6 March 2015

Statement of UNITI Bundesverband mittelständischer Mineralölunternehmen e.V. regarding the proposed harmonised classification and labelling of

Reaction products of paraformaldehyde with 2-hydroxypropylamine (ratio 1:1), (HPT)

UNITI Bundesverband mittelständischer Mineralölunternehmen e.V. (UNITI) is the German association representing small and medium-sized companies in the fuels, lubricants and heating fuels sector. The member companies employ approximately 75.000 people, with a total annual turnover of about 35 billion Euros. The numerous independent small and medium-sized lubricant manufacturers represented by UNITI have a market share of about 50 percent in Germany. Many UNITI member companies produce metal working fluids for the national, European and international market and use HPT and other Formaldehyde releasers in their products.

According to the proposal for harmonised classification of Reaction products of paraformaldehyde with 2-hydroxypropylamine (ratio 1:1) (HPT), it is proposed to classify HPT as Carc. 1B, H350 and Muta 2, H341 in analogy to Formaldehyde.

The proposal is not based on the inherent hazard of HPT but on the potential for local Formaldehyde effects following hydrolysis of the Formaldehyde releasing molecule HPT. Moreover, the proposed classification is based on the fictitious presumption that the total amount of bounded Formaldehyde in HPT is releasable. Thus, there are substantial doubts to classify HPT in the same way as its hydrolysis product Formaldehyde. Normally, the classification according to CLP regulation is related to the hazards of a substance as placed on the market that means for HPT on the basis of the amount of free (unbound) Formaldehyde present in HPT. Therefore, in our opinion HPT cannot be considered as carcinogenic or mutagenic and shall not be classified as Carc. 1B, H350 and Muta 2, H341.

UNITI fully supports the statements of the Formaldehyde Biocide Interest Group (FABI) of 6 March 2015 with the titles “Statement supporting the comments provided by Schülke concerning the proposed harmonised classification for Reaction products of paraformaldehyde with 2-hydroxypropylamine (ratio 1:1) (HPT)” and “Legal & Regulatory Statement from FABI members in response to the 45 day public consultation on the proposed harmonised classification of Reaction products of paraformaldehyde with 2-hydroxypropylamine (ratio 1:1) (HPT)”.

We strongly recommend to take into account the various well-reasoned arguments of the FABI statements in the evaluation of the proposal for harmonised classification and labelling of HPT. The FABI statements of 6 March 2015 are attached.