

## **Minority opinion regarding the classification of formaldehyde**

by Andrew Smith, February 2013

The minority opinion regarding the classification of formaldehyde is the following:

Whilst formaldehyde does appear to have potential to damage the genetic material, the available evidence shows that it does not appear to be able to reach the germ cells following conventional oral, dermal or inhalational routes of exposure. Consequently, I am of the opinion that formaldehyde does not present a relevant germ cell mutagenicity hazard to humans.

Whilst I agree that substances should be classified as suspected germ cell mutagens where there is evidence only of somatic cell genotoxicity, this does not appear to be relevant for formaldehyde because of what we know about its toxicokinetic profile. I do not agree that the current ECHA guidance on this aspect of the criteria should always be read literally, without the possibility of applying scientific judgement in exceptional circumstances such as this.

In my opinion, formaldehyde should not be classified according to the CLP Regulation for the human health hazard endpoint germ cell mutagenicity; it should not be labelled "Suspected of causing genetic defects."