Berlin, 23 January 2015

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

Reaction product of paraformaldehyde and 2-hydroxypropylamine (ratio 3:2), (MBO)

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 MBO and other Formaldehyde releasers in their products.

According to the proposal for harmonised classification of Reaction product of paraformaldehyde and 2-hydroxypropylamine (ratio 3:2) (MBO), it is proposed to classify MBO as Carc. 1B, H350 and Muta 2, H341 in analogy to Formaldehyde.

The proposal is not based on the inherent hazard of MBO but on the potential for local Formaldehyde effects following hydrolysis of the Formaldehyde releasing molecule. There are substantial doubts to classify MBO 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 MBO on the basis of the amount of free (unbound) Formaldehyde present in MBO. Therefore, in our opinion MBO cannot be considered as carcinogenic or mutagenic and shall not be classified as Carc. 1B, H350 and Muta 2, H341.

UNITI fully supports the statement of the Formaldehyde Biocide Interest Group (FABI) of 23 January 2015 with the title “Statement supporting the comments concerning the proposed harmonised classification for Reaction product of paraformaldehyde and 2-hydroxypropylamine (ratio 3:2) (MBO)”. We strongly recommends to take into account the various well-reasoned arguments of the FABI statement in the evaluation of the proposal for harmonised classification and labelling of MBO. The FABI statement of 23 January 2015 is attached.