

*Recommendation from the Scientific Committee on
Occupational Exposure Limits
for Formaldehyde*

8 hour TWA:	0.2 ppm
STEL (15 mins):	0.4 ppm
Additional classification:	skin sensitiser

Substance Identity and Properties:

Formaldehyde CH₂O

Classification: Carc. Cat. 3; R40 Limited evidence of a carcinogenic effect.

T; R23/24/25 Toxic by inhalation, in contact with skin and if swallowed.

C; R34 Causes burns.

R43 May cause sensitization by skin contact.

Synonyms: methanal, oxomethane, oxymethylene, methylene oxide, methyl aldehyde

Chemical Name formaldehyde

CAS Number: 50-00-0

Molecular Weight: 30.03

Melting point: -92°C

Boiling point: -21°C

Conversion factor: 1 ppm \approx 1.23 mg/m³

Occurrence and Use:

Formaldehyde is a colourless gas with a pungent odour (Reuss et al. 1988). Its widest use is in the production of resins with urea, phenol and melamine and, to a small extent, their derivatives. Based on its chemical reactivity, formaldehyde is also used for preservation and disinfection, as well as an antimicrobial agent (preservative) in cosmetic products.

Formaldehyde is a ubiquitous compound in the environment, and it is an important endogenous chemical that occurs in most life forms, including humans (IARC 1995).

Health Significance:

As a result of its reactivity in target tissues with direct contact with the substance, formaldehyde causes local irritation, acute and chronic toxicity and has genotoxic and cytotoxic properties (DFG 2000, DECOS 2003, Nordic Expert Group 2003).

Studies with volunteers yielded threshold concentrations for odour perception of less than 0.5 ppm, for eye irritation of 0.5 to 1 ppm and for nose and throat irritation of 1 ppm; eye irritation was observed in some cases also at lower concentrations. In workers exposed long-term to formaldehyde at the workplace, lesions were observed in the nasal mucosa even at average exposure concentrations below 1 ppm (DFG 2000). The experimental no-effect-level of sensory irritation in BALB/c mice has been determined to be 0.3 ppm (Damgård Nielsen et al. 1999).

Formaldehyde causes sensitisation of the skin and to a lesser extent bronchial asthma (Lemière et al. 1995).

Toxicokinetics and mechanisms of formaldehyde inactivation

Several mechanisms are involved in the inactivation of formaldehyde. The inhaled hydrophilic gas dissolves first of all in the layer of mucus covering the nasal epithelium; reactions with components of the mucus (Bogdanffy *et al.* 1987) and mechanical clearance of the mucus represent the first barrier. From a certain exposure concentration mucociliary clearance is impaired. In inhalation studies with rats exposed to 15 ppm, the mucociliary function in the frontal nasal region was inhibited and marked mucostasis was observed. After 6 ppm only certain areas were affected. After 2 ppm minimal changes in the mucus flow rate were observed, whilst 0.5 ppm had no effect (Morgan *et al.* 1986). With sufficiently high exposure concentrations, a concentration gradient of free formaldehyde was established within the layers of the nasal epithelium. Under these circumstances, in the fully differentiated cells near the surface, the actual concentration is higher than in the lower-lying proliferating stem cells. In the rostral third of the respiratory epithelium, however, the epithelium consists of only two cell layers with few basal cells (Hermann 1997). In the epithelial cells there are several ways inactivation can take place. Direct reactions with protein and RNA in the cytosol probably remove a large amount of free formaldehyde (Casanova-Schmitz *et al.* 1984a). The molecule may enter the C_1 pool of cell metabolism, and there is effective GSH-dependent oxidation by formaldehyde dehydrogenase (Heck and Casanova-Schmitz 1984, Heck and Casanova 2004).

The concentration of endogenous formaldehyde in human blood is about 2-3 mg/l; similar concentrations are found in monkeys and in rats. Exposure of humans, monkeys or rats to formaldehyde by inhalation has not been found to alter the concentration of formaldehyde in the blood. The average level of formate in the urine of people not occupationally exposed to formaldehyde is 12.5 mg/l and varies considerably both within and between individuals. No

significant changes of urinary formate were detected after exposure to 0.4 ppm formaldehyde for up to 3 weeks in humans (IARC 2005).

Acute toxicity

Studies of the sensory irritation caused by formaldehyde in mice and rats showed the mouse to be markedly more sensitive (Barrow *et al.* 1983, 1986, Chang *et al.* 1981, 1984). The concentration, which after short-term exposure leads to a reduction in the respiration rate to 50 % (RD₅₀) in mice, was found to be between 3 and 5 ppm (Chang *et al.* 1981, Schaper 1993). A clear no-effect level for nasal irritation in mice was found to be at 0.3 ppm (Damgård Nielsen *et al.* 1999). In rats, RD₅₀ values between 10 and 30 ppm have been reported (Cassee 1995, Cassee *et al.* 1996a, Chang *et al.* 1981, 1984, Schaper 1993).

Subacute, subchronic and chronic toxicity

Studies of the subchronic and chronic toxicity of inhaled formaldehyde have been documented by DFG (2000) and jointly by DECOS (2003) and the Nordic Expert Group (2003). In all animal experiments, the most noticeable toxic effects of formaldehyde were observed in the upper respiratory tract; these effects have been investigated in numerous studies.

In rats exposed to formaldehyde concentrations of 10 ppm, daily for 6 hours on 5 days a week, rhinitis, hyperplasia and squamous metaplasia of the respiratory epithelium of the nasal mucosa were described in all studies. In rats exposed to 1.0 ppm for 2 years no histopathological changes were observed (no observed adverse effect level, NOAEL; Woutersen *et al.* 1989). From concentrations of 2 ppm, rhinitis, epithelial dysplasia and even papillomatous adenomas and squamous metaplasia of the respiratory epithelium of the nose were found, from 6 ppm squamous cell carcinomas (Kerns *et al.* 1983, Swenberg *et al.* 1980). At this concentration also the cell proliferation rate in the nasal mucosa was increased transiently, and from 10 ppm increased permanently (Monticello *et al.* 1996).

Uninterrupted exposure of rats for 8 hours/day ("continuous") was compared with 8 exposures for 30 minutes followed by a 30-minute phase without exposure ("intermittent") in two 13-week studies with the same total dose. Effects were seen only after intermittent exposure to formaldehyde concentrations of 4 ppm, but not after continuous exposure to 2 ppm. The authors concluded that the toxicity in the nose depends on the concentration and not on the total dose (Wilmer *et al.* 1989). In mice exposed to formaldehyde concentrations of 2.0, 5.6 or 14.3 ppm for 2 years (6 hours/day, 5 days/week), rhinitis and epithelial hyperplasia was observed, from 5.6 ppm dysplasia, metaplasia and atrophy. Squamous cell carcinomas were observed only after concentrations of 14.3 ppm and above (Kerns *et al.* 1983).

In hamsters exposed to formaldehyde concentrations of 10 ppm (5 hours/day, 5 days per week) for life, survival was reduced and the incidence of hyperplasia and metaplasia (4/88, 5 %) was slightly increased, but not that of tumours (Dalbey 1982).

In cynomolgus monkeys exposed almost continuously to formaldehyde concentrations of 0.2, 1 or 3 ppm for 26 weeks, metaplasia and hyperplasia were observed in 1/6 and 6/6 animals of the 1 and 2 ppm groups, respectively. In the animals exposed to concentrations of 0.2 ppm, no histopathological changes were found (Rusch *et al.* 1983a, 1983b).

Reduced body weight gains were reported in rats exposed to formaldehyde concentrations from 10 ppm for 6 hours a day in a 13-week inhalation study (Woutersen *et al.* 1987) and in those exposed to concentrations from 5.6 ppm in a 2-year inhalation study (Kerns *et al.* 1983, Swenberg *et al.* 1980). In mice, reduced body weight gains were found in a 13-week inhalation study only at concentrations from 20 ppm. Other systemic effects were not observed in these studies. Only in a 26-week inhalation study with continuous exposure (22 hours a day, 7 days a week) were reduced absolute and relative liver weights observed from concentrations as low as 3 ppm (in addition to reduced body weight gain and lesions in the nasal region) (Rusch *et al.* 1983a, 1983b).

Single and repeated exposures in humans

Studies with the controlled exposure of volunteers must be distinguished from epidemiological studies of persons exposed at the workplace or under certain environmental conditions. The most reliable data are obtained in controlled studies with volunteers. Studies of persons exposed at the workplace are less suitable for making quantitative statements, mainly because of uncertain levels of exposure. The available studies have been documented by a panel of independent experts convened by the Industrial Health Foundation (IHF; Paustenbach *et al.* 1997). The data were indicative of a relatively wide individual susceptibility to irritation from formaldehyde. Data available for eye irritation from a total of 17 studies have been compiled and evaluated. A concentration-effect curve (Paustenbach *et al.* 1997) was constructed that shows that at concentrations between 0.5 and 1 ppm, exposure for up to 6 hours can produce eye irritation in 5% to 25% of the exposed persons. It was concluded by the group from the available data that with maximum concentrations at the workplace of 0.3 ppm for 8 hours “almost all the workers” are protected against eye irritation. Significant increases in eye irritation are reported, however, only at concentrations of at least 1 ppm, which is the reason that this concentration is often regarded as a ceiling value.

Very recently, the question of a threshold for chemosensory irritation was experimentally addressed by Lang *et al.* (2008). This study was made available to SCOEL by FORMACARE. Twenty-one volunteers (11 m, 10 f) were examined over a 10 weeks period using a repetitive design. Each subject was exposed to 10 exposure conditions on 10 consecutive working days, each for 4 h. During 4 of the 10 sessions, ethyl acetate (12-16 ppm) was used as a masking agent for formaldehyde exposure. Measurements were related to conjunctival redness, blinking frequency, nasal flow and resistance, pulmonary function and reaction times. Subjective assessments included discomfort, and the influence of personality factors on subjective scoring was also evaluated. Blinking frequency and conjunctival redness, ranging from slight to moderate, were significantly increased by short-term peak exposures of 1.0 ppm that occurred at a baseline exposure of 0.5 ppm formaldehyde. Results of subjective ratings indicated eye and olfactory symptoms at concentrations as low as 0.3 ppm. Nasal irritation was reported at concentrations of 0.5 ppm plus peaks of 1.0 ppm, as well as at levels of 0.3 ppm and 0.5 ppm with co-exposure to ethyl acetate. The ethyl acetate exposure was also perceived as irritating. No significant treatment effects were noted regarding nasal flow and resistance, pulmonary function and reaction times. When negative affectivity was introduced as a covariate, the level of 0.3 ppm was no longer an effect level, but 0.5 ppm with peaks of 1.0 ppm was. The authors concluded that eye irritation was the most sensitive parameter recorded, and that the no-observed-adverse-effect levels for subjective and objective eye irritation were 0.3 and 0.5 ppm, respectively.

Carcinogenic effects in experimental animals

In a 2-year inhalation study with F344 rats, squamous cell carcinomas of the nose were observed. Exposure was to formaldehyde concentrations of 0, 2.0, 5.6 and 14.3 ppm, for 6 hours/day on 5 days/week. All the animals exposed to formaldehyde developed rhinitis, epithelial dysplasia and metaplasia in the nasal cavity. After 18 months, 15/40 animals of the high exposure group had developed hyperplasia. In all the groups exposed to formaldehyde, metaplasia preceded dysplasia. If the exposure was interrupted for longer than 3 months, the rhinitis and metaplasia began to regress. After 24 months, squamous cell carcinomas were found in the nasal cavities only in the middle dose group (0.9 %) and in the high dose group (44 %). In the high dose group, undifferentiated carcinomas and sarcomas were also found. Also the number of polypoid adenomas was slightly increased in the male animals. The total tumour incidence in the high dose group was 48.7 % (Kerns *et al.* 1983, Swenberg *et al.* 1980). The formation of nasal tumours in the rat after high level exposure to formaldehyde (> 6 ppm) has been confirmed in other studies (Feron *et al.* 1988, Monticello *et al.* 1996, Woutersen *et al.* 1989).

In another long-term study over 28 months, F344 rats were exposed to formaldehyde concentrations of 0, 0.3, 2.0 and 15 ppm for 6 hours/day, 5 days/week. Although keratinizing squamous cell carcinomas were found only in the high dose group (in 13 of 32 animals), the incidence of epithelial hyperplasia and metaplasia of the nasal respiratory mucosa was significantly increased in all exposed groups. As inflammatory infiltration of the nasal mucosa, erosion and oedema were described in both the controls and the exposed animals, the possibility cannot be excluded that the hyperplasia and metaplasia were caused by the interaction of formaldehyde and inflammatory damage to the nasal mucosa (Kamata *et al.* 1997). Therefore, this study cannot be included in the present assessment.

In a 2-year inhalation study with B6C3F1 mice exposed to formaldehyde concentrations of 0, 2.0, 5.6 or 14.3 ppm for 6 hours/day on 5 days/week, squamous cell carcinomas of the nasal cavity were found in only 2/240 animals (0.8 %) of the high dose group. Epithelial metaplasia and dysplasia of the respiratory epithelium were, however, also observed (Kerns *et al.* 1983). In hamsters exposed to concentrations of 10 or 30 ppm, no tumours were found (Dalbey 1982, IARC 1995, WHO 1989) and the incidence of non-neoplastic changes of the nasal epithelium was low.

Formaldehyde was administered in the drinking water for 2 years to Wistar rats in doses of 0, 10, 50 or 300 mg/kg body weight and day (Tobe *et al.* 1989) and 0, 1.2, 15 or 82 mg/kg body weight and day for male animals and 0, 1.8, 21 or 109 mg/kg body weight and day for female animals (Til *et al.* 1989). No changes were produced with doses up to 10 mg/kg body weight and day, and 15 and 21 mg/kg body weight and day, respectively. In almost all animals given doses from 50 mg/kg body weight, and 82 and 109 mg/kg body weight, histopathological changes in the forestomach (hyperplasia, keratinisation) and inflammation and ulcers of the glandular stomach were found. In addition, at doses of 82 and 109 mg/kg body weight per day, food and liquid consumption, and body weight gains were reduced. There was no increase in the incidence of tumours (Tobe *et al.* 1989, Til *et al.* 1989). Til and associates note, however, that some of the histopathological changes they classified as hyperplasia could have been classified as papillomas by other pathologists. In the study of Til *et al.* (1989), also renal changes (increased relative kidney weights, necrosis), and changes in the composition of the urine were observed in the female animals of the high dose group; the authors attribute this to the reduced drinking-water consumption.

In another drinking-water study, formaldehyde was administered to 7-week-old male and female Sprague-Dawley rats for 104 weeks in concentrations of 0, 10, 50, 100, 500, 1000 or 1500 mg/l drinking-water. In addition, 25-week-old male and pregnant female animals, and later their offspring were given formaldehyde in concentrations of 0 or 2500 mg/l. Reduced body weights were found only in the animals (offspring) exposed from the embryonal phase. In the animals of the groups exposed to formaldehyde concentrations of 50 mg/l and above and the animals of the 2500 mg/l group, the incidence of leukaemia (lymphoblastic leukaemia, lymphosarcomas) was increased in a dose-dependent manner (controls 3.5%, 10 mg/l: 3.0%, 50 mg/l: 9%, 500 mg/l: 12%, 1000 mg/l: 13%, 1500 mg/l: 18%, 2500 mg/l: 11.1 %). Data for the statistical significance of the findings or for the historical controls were not given by the authors (Soffritti *et al.* 1989). Despite criticism of this study, IARC (1995) regarded these data as being dose-dependent and significantly different from the data for the controls. Benign and malignant gastrointestinal tumours, which according to Soffritti *et al.* are very rare in this strain of rat (all incidences < 0.1%), were increased in particular in the animals of the following groups: 1000 mg/l (1%: leiomyosarcomas), 1500 mg/l (2%: adenomas) and 2500 mg/l (parent animals: 2.8%: papillomas and acanthomas, 2.8%: adenocarcinomas; offspring: 1.4%: adenomas, 1.4%: squamous cell carcinomas, 1.4%: adenocarcinomas, 2.7%: leiomyosarcomas) (Soffritti *et al.* 1989). The validity of this study has been questioned as a result of its conduct and the methods used (Feron *et al.* 1990).

Soffritti *et al.* (1989, 2002) reported about a 104 week study in male and female Sprague-Dawley rats exposed to 10, 50, 100, 500, 1000, 1500 and 2500 mg/l formaldehyde in drinking water. Animals were kept until spontaneous death. An increase of malignant tumours at various sites was noted, in particular of gastro-intestinal tumours and leukaemias. The study is difficult to evaluate because it was not conducted according to GLP standards and documentation has not been sufficient.

Human epidemiology

Over 25 cohort studies concerning professionals or industrial workers have examined the association between formaldehyde and cancer. Some have been conducted on workers exposed to formaldehyde in the chemical, garment, fibreglass, iron, woodworking, plastics and paper, pulp and plywood industries. Others are studies of professional groups (mainly health professionals, embalmers and funeral directors). Case-control studies have also been used to examine the association of formaldehyde with various cancers and, for rarer tumours such as sinonasal and nasopharyngeal cancer, they have the potential to provide greater statistical power than can normally be achieved in cohort studies. Against this advantage, however, must be set the difficulties in assessing retrospectively exposure to formaldehyde in community-based studies.

The carcinogenicity of formaldehyde has recently been re-evaluated by IARC (2006). In particular, three major cohort studies previously evaluated (IARC 1982, 1995), and since then updated for follow-up and for exposure assessment, were considered.

NCI cohort and leukaemias and lymphohematopoietic cancers

A cohort studied by the U.S. National Cancer Institute (NCI) consisted of 25,619 workers (865 708 person-years) employed before January 1, 1966, at one of 10 U.S. industrial plants and followed through December 31, 1994. Among the cohort, there were 178 deaths from

lymphohematopoietic malignancies. Relative risks for leukemia (69 deaths), particularly for myeloid leukaemia (30 deaths), increased with formaldehyde exposure. Compared with workers exposed to low peak levels of formaldehyde (0.1-1.9 ppm), relative risks for myeloid leukemia were 2.43 (95% CI = 0.81 to 7.25) and 3.46 (95% CI = 1.27 to 9.43) for workers exposed to peak levels of 2.0-3.9 ppm and ≥ 4.0 ppm, respectively ($P(\text{trend}) = .009$). Compared with workers exposed to low levels of average exposure intensity of formaldehyde (0.1-0.4 ppm), workers exposed to 0.5-0.9 ppm and ≥ 1.0 ppm average intensity had relative risks of 1.15 (95% CI = 0.41 to 3.23) and 2.49 (95% CI = 1.03 to 6.03), respectively ($P(\text{trend}) = .088$). The relative risk for leukemia was not associated with cumulative exposure but was weakly associated with duration of exposure (Hauptmann *et al.* 2003).

Marsh and Youk (2004) re-analysed the data from the updated NCI cohort (Hauptmann *et al.*, 2003) and reproduced the results presented by Hauptmann *et al.* (2003). Three additional analyses were performed. Exposure category-specific SMRs, based on mortality rates for the general US population, increased with increasing peak and average intensity of exposure for all leukaemias combined and for myeloid leukaemia. Findings were similar when regional mortality rates were used. The use of alternative cut-points for categories of average intensity of exposure in order to achieve similar numbers of deaths from the combined group of all leukaemias in each exposed category resulted in similar relative risk estimates to those previously observed by Hauptmann *et al.* (2003). Analyses of duration of time worked in the highest peak category did not generally indicate higher risks among those who had experienced high peaks for a longer time.

NCI cohort and nasopharyngeal cancers

A second publication focussed on solid cancers observed in the same cohort. In this extended follow-up of formaldehyde-exposed workers, the authors evaluated mortality from solid cancers (1,921 deaths) among 25,619 workers (865,708 person-years) employed in 10 US formaldehyde-producing or -using facilities through 1994. Exposure assessment included quantitative estimates of formaldehyde exposure. Standardized mortality ratios and relative risks were calculated. Compared with that for the US population, mortality from solid cancers was significantly lower than expected among subjects exposed and non-exposed to formaldehyde (standardized mortality ratios = 0.91 and 0.78, respectively). Relative risks for nasopharyngeal cancer (nine deaths) increased with average exposure intensity, cumulative exposure, highest peak exposure, and duration of exposure to formaldehyde ($p\text{-trend} = 0.066$, 0.025, <0.001 , and 0.147, respectively). Formaldehyde exposure did not appear to be associated with lung (744 deaths), pancreas (93 deaths), or brain (62 deaths) cancer. Although relative risks for prostate cancer (145 deaths) were elevated for some measures of formaldehyde exposure, the trend was inconsistent. Regarding solid cancers, some evidence was found in this cohort of formaldehyde-industry workers of an exposure-response relation with mortality from nasopharyngeal cancer (based on small numbers) but not for cancers of the pancreas, brain, lung, or prostate (Hauptmann *et al.* 2004).

In 2002, Marsh *et al.* published a follow-up of their independent analysis conducted at one of the 10 plants included in the NCI cohort, the Wallingford plant or Plant 1, together with a case-control analysis (Marsh *et al.* 2002). They concluded that the pattern of findings suggested that the large, persistent NPC excess observed among the Wallingford workers was

not associated with formaldehyde exposure, and could reflect other (non) occupational risk factors.

A re-analysis of the updated NCI cohort, concerning the mortality risks from nasopharyngeal cancer, was later presented by Marsh and Youk (2005). They pointed out that the statistically significant exposure-response relation for this malignancy in the NCI study was driven entirely by a large excess of this tumour in “Plant 1” for the highest peak exposure category (4+ ppm). An independent and larger re-analysis of Plant 1 found that this excess was not associated with formaldehyde exposure. The authors concluded that the re-analysis provided little evidence to support the suggestion of a causal association between formaldehyde exposure and mortality from nasopharyngeal cancer.

Marsh et al. (2007) conducted two additional re-analyses of the NCI cohort data which confirmed their previous conclusions (Marsh et al. 2002) that the elevated NPC risks in plant 1 were more likely due to factors external to the workplace. An additional analysis suggests that the increased risk of NPC might be associated with previous employment in the metal industry (Marsh et al. 2007).

The second major study considered by IARC was also from the United States (NIOSH). To evaluate the mortality experience of 11,039 workers exposed to formaldehyde for three months or more in three garment plants. The mean time weighted average formaldehyde exposure at the plants in the early 1980s was 0.15 ppm but past exposures may have been substantially higher. Vital status was updated through 1998, and life table analyses were conducted. Mortality from all causes (2206 deaths, standardised mortality ratio (SMR) 0.92, 95% CI 0.88 to 0.96) and all cancers (SMR 0.89, 95% CI 0.82 to 0.97) was less than expected based on US mortality rates. A non-significant increase in mortality from myeloid leukaemia (15 deaths, SMR 1.44, 95% CI 0.80 to 2.37) was observed. Mortality from myeloid leukaemia was greatest among workers first exposed in the earliest years when exposures were presumably higher, among workers with 10 or more years of exposure, and among workers with 20 or more years since first exposure. No nasal or nasopharyngeal cancers were observed. Mortality from trachea, bronchus, and lung cancer (147 deaths, SMR 0.98, 95% CI 0.82 to 1.15) was not increased. Mortality from leukaemia was increased almost twofold among workers with both 10 or more years of exposure and 20 years or more since first exposure (15 deaths, SMR 1.92, 95% CI 1.08 to 3.17). Mortality from myeloid leukaemia among this group of workers appeared also significantly increased (8 deaths, SMR 2.55, 95% CI 1.10 to 5.03). It was concluded that the results supported a possible relation between formaldehyde exposure and myeloid leukaemia mortality. Limitations of the study include limited power to detect an excess for rare cancers such as nasal and nasopharyngeal cancers and lack of individual exposure estimates (Pinkerton et al. 2004).

The third major study considered by IARC had been conducted in the U.K. This study extended by 11 years the follow-up of an existing cohort of 14,014 men employed after 1937 at six British factories where formaldehyde was produced or used. Subjects had been identified from employment records, and their jobs had been classified for potential exposure to formaldehyde. Standardized mortality ratios (SMRs) were derived using the person-years method and were compared with the expected numbers of deaths for the national population. During follow-up through December 31, 2000, 5185 deaths were recorded, including two from sino-nasal cancer (2.3 expected) and one from nasopharyngeal cancer (2.0 expected). Relative to the national population, mortality from lung cancer was increased among those who worked with formaldehyde, particularly in men in the highest of four estimated exposure

categories (>2 ppm) (SMR = 1.58, 95% confidence interval = 1.40 to 1.78), and the increase persisted after adjustment for local geographic variations in mortality (SMR = 1.28, 95% confidence interval = 1.13 to 1.44). However, there was a statistically non-significant decrease in the risk of death from lung cancer with duration of high exposure ($P(\text{trend}) = .18$), and this risk showed no trend with time since first high exposure ($P(\text{trend}) = .99$) (Coggon et al. 2003).

The IARC Working Group concluded that there was sufficient evidence in humans that formaldehyde causes nasopharyngeal cancer, on the grounds that there was a statistically significant excess of deaths from nasopharyngeal cancer in the largest and most informative cohort study of industrial workers (Hauptmann et al 2004), with statistically significant exposure-response relationships for peak and cumulative exposure. These conclusions might, however, need to be re-interpreted in light of the recent studies conducted by Marsh and colleagues (Marsh et al. 2002; Marsh and Youk, 2005; Marsh and Youk 2007, Marsh et al. 2007). An excess of deaths from nasopharyngeal cancer was also observed in a proportionate mortality analysis of the largest US cohort of embalmers (Hayes et al 1990), and an excess of cases of nasopharyngeal cancer was observed in a Danish study of proportionate cancer incidence among workers at companies that manufactured or used formaldehyde (Hansen and Olsen 1995). Although other cohort studies reported fewer cases of nasopharyngeal cancer than expected (Walrath and Fraumeni 1983, Coggon et al. 2003, Pinkerton et al. 2004), the Working Group noted that the deficits were small and the studies had low power to detect an effect on nasopharyngeal cancer. Of seven case-control studies of nasopharyngeal cancer (Olsen et al. 1984, Vaughan et al. 1986a, Vaughan et al. 1986b, Roush et al. 1987, West et al. 1993, Armstrong et al. 2000, Vaughan et al. 2000, Hildesheim et al. 2001), five found elevations of risk for exposure to formaldehyde.

It was mentioned that leukaemia mortality, primarily myeloid-type, was increased in six of seven cohorts of embalmers, funeral-parlour workers, pathologists, and anatomists. These findings had previously been discounted by IARC because an increased incidence of leukaemia had not been seen in industrial workers. The recent updates, however, reported a greater incidence of leukaemia in two cohorts of US industrial workers and US garment workers, but not in a third cohort of United Kingdom chemical workers. A recent meta-analysis found that, overall, the relative risk for leukaemia was increased and did not vary significantly among studies (Collins and Lineker 2004). The Working Group concluded that there was “strong but not sufficient evidence for a causal association between leukaemia and occupational exposure to formaldehyde”.

Several case-control studies had associated exposure to formaldehyde with sinonasal adenocarcinoma and squamous-cell carcinoma. However, confounding from wood dust exposure occurred in these studies, and no excess of sinonasal cancer was reported in the updated cohort studies. The IARC Working Group concluded that there was limited evidence in humans that formaldehyde causes sinonasal cancer (IARC 2005).

Genotoxicity

Genotoxic and mutagenic effects of formaldehyde were found in various *in vitro* test systems. As a reactive compound, formaldehyde reacts with nucleic acids and proteins. DNA adducts, DNA-protein crosslinks, strand breaks and the induction of repair were detected *in vitro*. Formaldehyde also produced back mutation and forward mutation in bacteria. High concentrations of formaldehyde (4 mM) produced insertions, deletions and point mutations in GC base pairs in the gpt gene of *Escherichia coli* (Crosby *et al.* 1988). Gene mutations were detected also in lymphoblasts treated with formaldehyde (Liber *et al.* 1989). Most of the mutations were AT → CG transversions at specific sites. Tests with V79 cells from the Chinese hamster, on the other hand, showed that although cytotoxicity parallels sister chromatid exchange (SCE) and micronucleus (MN) formation results from the formation of DNA-protein crosslinks, no gene mutation occurred (Merk and Speit 1998). Chromosomal aberrations (CA) (Natarajan *et al.* 1983) and SCE (Schmidt *et al.* 1986) were reported. Thus the mutagenic effects of formaldehyde are well-documented from *in vitro* studies.

Results of *in vivo* studies are more difficult to evaluate. Of particular importance is the question whether cytogenetic effects can only occur as the result of local exposure or also as the result of the systemic availability of formaldehyde. In the rat, chromatid breaks are described in cells from lung lavage after repetitive inhalation exposures to 15 ppm, but not at lower levels of exposure (Dallas *et al.* 1992). MN in the gastrointestinal epithelium were reported after gavage of formaldehyde (Migliore *et al.* 1989).

The incidence of MN was increased in cells of the nasal mucosa in non-smoking workers of a plywood factory relative to that in controls. In this case, however, there was mixed exposure to formaldehyde and wood dust (Ballarin *et al.* 1992) and the effects did not correlate with the dose.

In cultures of lymphocytes isolated from blood samples from persons exposed to formaldehyde concentrations of up to 9.8-11.0 mg/m³ (8-8.9 ppm) in pathological laboratories, the incidences of chromosomal aberrations and SCE were not increased (Thomson *et al.* 1984). In workers from a paper factory, the incidence of CA was increased, but not that of SCE (Bauchinger and Schmid 1985). A slight increase in SCE was observed in the lymphocytes of students of an anatomy course compared to the values before the beginning of the course in which they were exposed to average formaldehyde concentrations of 1.2 ppm (Yager *et al.* 1986). In all three studies the number of cases was very small and the effects slight.

In vivo, DNA-protein crosslinks were detected in the epithelium of sections of the trachea (Cosma *et al.* 1988b) and in the nasal epithelium of rats exposed to formaldehyde (Casanova and Heck 1987, Casanova *et al.* 1989, 1994, Casanova-Schmitz and Heck 1983, Casanova-Schmitz *et al.* 1984a, Heck and Casanova 1995, Lam *et al.* 1985). In monkeys, the levels of DNA-protein crosslinks were highest in the mucosa of the middle turbinates; lower concentrations were produced in the anterior lateral wall/septum and nasopharynx. Very low concentrations were found in the larynx, trachea and *carina tracheae* and in the proximal portions of the major bronchi (Casanova *et al.* 1991). The incidences of DNA-protein crosslinks varied widely in the various regions of the nasal cavity, and in the monkey in the deeper sections of the respiratory passages (Casanova *et al.* 1991, 1994). The distribution of DNA-protein crosslinks correlated with the probability of deposition of formaldehyde dictated by the anatomy and physiology of the various sections of the nose (Hubal *et al.* 1997).

In the nasal epithelium of F344 rats, DNA-protein crosslinks were still detected at formaldehyde concentrations as low as 0.3 ppm (Casanova *et al.* 1994). In the experiments with rhesus monkeys, they were also found at the lowest concentration of 0.7 ppm (Casanova *et al.* 1991). In the DNA of white blood cells from workers exposed to formaldehyde (average concentrations determined by personal air sampling: 2.8-3.1 ppm), the incidence of DNA-protein crosslinks was significantly higher than in control persons ($p = 0.03$). Assuming that formaldehyde reaches the blood cells via the lungs, it was suggested DNA-protein crosslinks be used as a biomarker for exposure to formaldehyde (Shaham *et al.* 1996). Because of methodological shortcomings, this study has, however, been heavily criticized (the blood samples were allowed to stand for 3 hours, the intra-individual and analytical variability were not determined, formaldehyde-induced DNA-protein crosslinks and DNA-protein crosslinks of other genesis were not differentiated; Casanova *et al.* 1996); however, a more recent study by the same group has been considered (IARC, 2005) to reveal increased DNA protein cross-links in workers exposed to formaldehyde (Shaham *et al.*, 2003).

DNA-protein crosslinks induced by formaldehyde can be removed by repair. Half-lives of 2 to 4 hours have been reported. Accordingly, DNA-protein crosslinks can usually no longer be detected 24 hours after exposure (Cosma and Marchok 1988a,b, Craft *et al.* 1987, Grafström *et al.* 1983, 1984, Magana-Schwenke and Moustacchi 1980, Merk and Speit 1998). In sections of the tracheal epithelium of rats, the DNA-protein crosslinks had been almost completely removed within 48 to 72 hours after the treatment, depending on the concentration of the instilled aqueous formaldehyde solutions (1.7-66.7 mM) (Cosma *et al.* 1988a,b). This corresponds to a half-life of about 7 hours. Histological examination revealed hyperproliferation in the tracheal epithelium. The accumulation of DNA-protein crosslinks was investigated; because of the methods used, however, the results cannot be evaluated conclusively (Casanova *et al.* 1994).

Schmid and Speit (2007) studied the dose-response of genotoxicity of formaldehyde in human blood cultures *in vitro*. DNA-protein crosslinks were induced at formaldehyde concentrations starting from 25 μM . However, DNA-protein crosslinks induced by formaldehyde concentrations up to 100 μM were completely removed before the lymphocytes started to replicate. SCE were induced at concentrations higher than 100 μM , parallel to the induction of cytotoxicity, determined as reduction of the replication index. MN were not induced by formaldehyde concentrations up to 250 μM , the highest concentration that could be tested.

Using a physiologically based pharmacokinetic model, it was calculated that in man fewer DNA-protein crosslinks are formed in the nasal mucosa than in the rat or monkey (Casanova *et al.* 1988, 1991).

In a long-term inhalation study with rats published by Monticello *et al.* (1996), point mutations were found in the p53 gene in 5 of 11 nasal tumours. The tumours expressed only the mutated gene. The role of formaldehyde in causing these mutations is unclear (Recio *et al.* 1992): p53 mutations have been detected in man in tumours of various genesis. In rodents, however, they are rare (Wolf *et al.* 1995), although the finding of p53 mutations in rat nasal SCC and the high prevalence of p53 mutations among human nasal SCC indicates that a common molecular alteration is shared between rodent and human SCC (Recio, 1997). Often the mutations are produced secondarily during the promotion or progression phase. The heterogeneous spectrum of mutations in the nasal tumours of rats suggests, thus, an important contribution of cell proliferation at such high levels.

In brief, there is consistent evidence for the genotoxicity of formaldehyde in *in vitro* systems, laboratory animals and exposed humans. DNA-protein cross links have been reproducibly detected in the nasal mucosa of rats, monkeys and workers exposed to formaldehyde and provide a useful marker of genotoxicity. The biphasic behaviour of the dose-response curve for this genotoxic endpoint points to a steeper slope at 2-3 ppm in Fischer 344 rats; for rhesus monkeys the slope is less well defined. At concentrations above 6 ppm of formaldehyde, genotoxicity is greatly amplified by cell proliferation, resulting in a marked increase of malignant lesions in the nasal passages (IARC, 2005).

Toxic effects on germ cells

The sperm count, sperm morphology and the occurrence of fluorescent bodies were investigated in 11 employees who carried out autopsies and were exposed to average formaldehyde concentrations of 0.61 to 1.32 ppm. No significant differences from the controls were found (Ward *et al.* 1983, 1984). The exposure levels were, however, low and the number of persons investigated small.

The toxic effects of formaldehyde on germ cells have been demonstrated in numerous tests with *Drosophila* (Alderson 1965, Herkowitz 1953, 1959), in particular after administration with the diet, and were limited to effects on early spermatocytes of the larvae (see IARC 1982). Gaseous formaldehyde had no effect. In tests for mosaic mutations in *Drosophila* and in the Müller-5 test for recessive lethal mutations, formaldehyde yielded positive results (Szabad *et al.* 1983). In a comparative test with the unstable zeste-white assay in *Drosophila melanogaster*, formaldehyde produced somatic mutations, but no germ cell mutations (Rasmuson and Larsson 1992). *In vitro*, during the reaction of formaldehyde with adenosine, a hydroxymethyl adduct was produced. This kind of nucleoside modification is thought to have marked germ-cell-stage-specific mutagenic effects in male *Drosophila* larvae (Alderson 1985).

Few studies have been carried out with mammals. In a review of the dominant lethal test, formaldehyde is listed with substances for which premature death of the foetuses and pre-implantation losses were within the control range (Epstein *et al.* 1972). In mice (Q strain) given single intraperitoneal injections of a 35% formaldehyde solution (dose: 50 mg/kg body weight) no chromosomal changes were found in the metaphase I spermatocytes (Fontignie-Houbrechts 1981). In the dominant lethal test, the number of pre-implantation and post-implantation losses in the first week of mating was twice the control value (Fontignie-Houbrechts 1981). In albino rats, marked dose-dependent effects were observed in the dominant lethal test in mating weeks one to three after intraperitoneal administration of 0.125 to 0.5 mg/kg body weight (1/4 to 1/16 of the lethal dose) in the form of a 37% solution stabilized with 10% methanol. Also the fertility of the treated male rats decreased in a dose-dependent manner (Odeigah 1997). In another test the authors found an increase in the number of abnormal sperm.

Thus, positive results were obtained in i.p. studies. This route is likely to lead to direct exposure of germ cells, bypassing the systemic circulation. This is because substances injected into the abdominal cavity can reach the testes directly via the inguinal canal. The relevance for conditions of human inhalation exposure of such results must be questioned.

Formaldehyde can therefore be regarded as a potential germ cell mutagen in rodents, with mutagenic effects when it reaches the target organ and the target structures in sufficient amounts, as was demonstrated in the dominant lethal test with intraperitoneal injection of

high-percentage solutions. Exposure to exogenous formaldehyde at levels which do not significantly increase the endogenous bioavailability of the substance is not expected to produce mutagenic effects on the germ cells. Specifically, this relates to exposures below the recommended OEL of 0.2 ppm. This is supported by toxicokinetic studies by inhalation in several species (see section on Toxicokinetics).

This conclusion is in line with the assessment of the US Agency for Toxic Substances and Disease Registry (ATSDR 1999) that the results of studies in humans and experimental animals indicate that it is very unlikely that low level exposure to formaldehyde can cause developmental or reproductive damage.

Conclusions considering modes of action

Experimental findings: Experimentally, formaldehyde elicits local tumours in the upper respiratory tract. It appears plausible that the occurrence of tumours in the nasal mucosa of rats and mice is the result of chronic proliferative processes caused by the cytotoxic effects of the substance. Evaluation of the data for the carcinogenic effects confirms this assumption. The dose-response relationships for all the parameters investigated, such as damage to the nasal epithelium, cell proliferation, tumour incidence and also the formation of DNA-protein crosslinks, is very flat for low level exposures and becomes much steeper at higher levels of exposure. For all the parameters mentioned, with the exception of the formation of DNA-protein crosslinks, concentrations which did not produce effects were demonstrated in the respective studies. The possibility of the formation of DNA-protein crosslinks cannot be excluded even with low levels of exposure. The data suggest, however, that with concentrations that do not lead to cell proliferation, only few DNA-protein crosslinks are formed. Moreover, formaldehyde-induced DNA-protein crosslinks are rapidly repaired, as evidenced in a number of biological systems (see Genotoxicity section). In addition, the physiological proliferation rate in the respiratory epithelium is low, and as long as this is not increased (which requires exposure to concentrations of more than 2 ppm), the probability that DNA-protein crosslinks are transformed into mutations is low. In the low dose range, which does not lead to an increase in cell proliferation, it has therefore been considered that the observed experimental genotoxicity of formaldehyde plays no or at most a minor part in its carcinogenic potential so that no significant contribution to human cancer risk is expected (Bolt 1987, DFG 2000, Conolly et al. 2004). Such a conclusion is supported by dosimetry modellings (Kimbell et al. 2001a,b) and results of a numerical risk assessment which, for persons exposed to concentrations of 0.3 ppm at the workplace for 40 years, yielded a very low additional cancer risk for non-smokers of 1.3×10^{-8} and for smokers of 3.8×10^{-7} (CIIT 1999).

Epidemiological findings: The increased risk of nasopharyngeal carcinoma induced by formaldehyde in exposed workers, if any, could be based on similar mechanisms as the experimental inductions of nasal tumors in rats. On one hand, dosimetry modellings have indicated that human nasal flux patterns shifted distally as inspiratory flow rate increased (Kimbell et al. 2001b), on the other hand it appears important that the rat breathes only through the nose while humans, especially upon physical work, show considerable mouth breathing in addition. As a further theory, a contribution of Epstein-Barr virus infections to nasopharyngeal carcinogenesis has been discussed. In essence, it may be concluded that the dose-response of human nasopharyngeal tumours elicited by formaldehyde must be non-linear at low doses, based on the modes of action established experimentally in rodents.

The possible induction of myeloid leukaemias by formaldehyde in humans is not so easy to explain, but there are indications that formaldehyde could induce this kind of malignancy. However, this would require that formaldehyde would act systemically and reach the bone marrow which is the target tissue. Such an action would not be possible within a range where the external dose does not change the physiological level of formaldehyde. No significant changes in formate excretion could be detected over a 3-week period of exposure to formaldehyde at a concentration in air of less than 0.4 ppm (Gottschling et al. 1984, IARC 2005). This indicates that the physiological homeostasis of endogenous formaldehyde is not challenged within this range of external exposure, and consequently, no systemic effects can be expected under such exposure conditions. These considerations are supported by exposure modellings based on data in different species (Heck and Casanova 2004).

Based on the "SCOEL Approach on OEL Recommendations for Carcinogens" (Bolt and Huici-Montagud 2008), SCOEL regards formaldehyde as a "genotoxic carcinogen, for which a practical threshold is supported". Consequently, a health-based OEL is recommended.

Recommendation:

For the derivation of an OEL for formaldehyde, which takes the carcinogenic risk into account, the avoidance of cell proliferation is critical. The cause of cell proliferation is the irritant effect of formaldehyde on the upper respiratory tract. For this effect, however, the database is insufficient for the establishment of a clear NOAEL value. Nevertheless, the database is much better for the irritant effects of formaldehyde on the eye, a more sensitive parameter (DECOS 2003, Nordic Expert Group 2003). It is generally considered that avoidance of sensory irritation of the eye and the upper respiratory tract will provide a safety margin to avoid irritation-induced local cell proliferation. Different evaluations have been published concerning the NOAEL of eye irritation in humans.

On the basis of an evaluation of a total of 17 controlled studies with volunteers it was concluded by an independent expert panel convened in the USA by the Industrial Health Foundation (IHF) that with daily exposure for 8 hours to maximum formaldehyde concentrations of 0.3 ppm "practically all workers" are protected against eye irritation. Animal data were considered supportive of this conclusion. In consequence, a concentration of 0.3 ppm formaldehyde was regarded as a practical NOAEL and was proposed as an OEL (Paustenbach *et al.* 1997).

By contrast, the identical database for sensory irritation of formaldehyde, as compiled by Paustenbach *et al.* (1997), was viewed by the joint DECOS (2003) and Nordic Expert Group (2003) committees to reveal that "at lower exposure levels sensory irritation may still occur in a substantial percentage of exposed individuals". The joint committees regarded 0.24 ppm (see below!) formaldehyde to be a LOAEL "at which sensory irritation may occur in a low but significant percentage of exposed workers". At the same time, it was stated that the majority of short- and long-term animal inhalation studies reveal a NOAEL of 1-2 ppm, with slight histopathological changes of the nasal respiratory epithelium being observed at 0.3-2 ppm. On this basis, DECOS (2003) recommended a health-based OEL (TWA) of 0.12 ppm (0.15 mg/m³), with a STEL of 0.42 ppm (0.5 mg/m³).

This discrepancy in evaluations of an identical data set by the IHF vs. DECOS/Nordic Expert

groups is mainly influenced by interpretation of two studies from Scandinavia.

The first was a field study on formaldehyde-induced discomfort (Wilhelmsson and Holmström 1992) that was not included in the evaluation by the IHF group, but was considered as a “not well-documented study” by the joint DECOS/Nordic group, showing that “more than 50% of 66 occupationally exposed workers complained of nasal discomfort after long-term exposure to an average concentration of 0.26 mg/m³ (0.22 ppm; range 0.05-0.6 mg/m³ or 0.04-0.5 ppm)”. In a reference group, 25% gave such reportings (Wilhelmsson and Holmström 1992). However, the publication neither gives methodological details of the questionnaire used, nor was the way of exposure assessment specified.

The second was a controlled study in volunteers (Andersen and Mølhave 1983) in which 3 out of 16 subjects reported eye irritation at a formaldehyde concentration of 0.24 ppm (see above). This study has the fundamental weakness that no control group with sham exposure was included. Whereas the joint DECOS/Nordic Export groups took this as a hint to sensory irritation in substantial percentages of individuals at less than 0.3 ppm formaldehyde, the IHF group’s argumentation was based on a concentration-response curve constructed from the entire body of data from the reported irritation studies. According to their evaluation irritation reportings may be obtained in 15-20% of non-exposed volunteers as well (Paustenbach et al. 1997). Recently, Arts et al. (2006) applied a benchmark approach to the study of Andersen and Mølhave (1983) and arrived at the conclusion that a concentration of 0.24 ppm formaldehyde, based on a 95% confidence interval and assuming a background response of 1/16, would be acceptable.

A very recent experimental study in human volunteers has been published by Lang et al. (2008), using subjective questionnaire ratings and objective methods (for details, see chapter “Single and Repeated Exposures in Humans”). This study provides a solid basis for an assessment. Subjective eye and olfactory symptoms were noted at concentrations as low as 0.3 ppm. Nasal irritation was reported at 0.5 ppm plus peaks of 1.0 ppm formaldehyde, as well as at levels of 0.3 ppm and 0.5 ppm with co-exposure to 12-16 ppm ethyl acetate. When the personal trait of negative affectivity was used as a covariate, the level of 0.3 ppm was no longer seen as an effect level. The authors concluded that the NOAEL for objective and subjective eye irritation was at 0.5 ppm formaldehyde in the case of a constant exposure, and at 0.3 ppm with peaks of 0.6 ppm in case of short-term exposures.

In general, SCOEL considers that the onset of eye irritation is a very sensitive parameter that provides a safety margin to the onset of irritation-induced cytotoxicity and cell proliferation. Introduction of a safety margin is essential, and SCOEL considers formaldehyde to be a “genotoxic carcinogen, for which a practical threshold is supported” (see chapter “Conclusions Considering Modes of Action”) provided that one can be confident that irritation is avoided.

Regarding the subjective symptoms of eye irritation, the very recent human volunteer study of Lang et al. (2008) has indicated an NOAEL of 0.3 ppm formaldehyde, if the personal trait of negative affectivity was treated as a co-variable.

According to the reasoning given above, the TWA-OEL of formaldehyde should be set at or below the NOAEL for sensory irritancy of the eye. In view of the limited number of persons that can be examined in a laboratory volunteer study (21 persons on the study of Lang et al. 2008), the exclusion of particularly sensitive persons with negative affectivity appears

problematic.

Therefore, SCOEL proposes an 8h-TWA of 0.2 ppm. This especially considers possible interindividual differences in susceptibility to irritation by formaldehyde, which may be expected based on the entire body of data. Short-term irritation may be prevented by a 15min-STEEL of 0.4 ppm. This STEEL is set below the threshold for objective eye irritation, as outlined by Lang et al. (2007).

At these levels, no systemic effect of formaldehyde is to be expected.

As a result of the exclusively local effects of formaldehyde, a “skin” notation is not required.

Formaldehyde is a well-known contact allergen to the skin. Against the background of a widespread use, respiratory sensitization has been reported only in single cases (DECOS 2003; Nordic Expert Group 2003).

At these levels of exposure, analytical difficulties are not expected.

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