

## Poland proposes a restriction on Methanol <sup>1</sup>

### SUMMARY

Poland has submitted a report proposing a restriction on the placing on the market for the supply to the general public of windshield washing fluids and denaturated alcohol containing methanol in concentrations equal or greater than 3% by weight.

The proposed restriction is intended to eliminate poisoning caused by consumption of windshield washing fluids and denaturated alcohol containing methanol in high concentrations. Individuals chronically abusing alcohol are known to consume these products as a surrogate of ethanol due to their lower prices. Ingestion of methanol may cause permanent blindness and death.

ECHA launches the public consultation on this proposed restriction today, which will end on 18 September 2015. However, the rapporteurs of ECHA's Committees for Risk Assessment (RAC) and Socio-economic Analysis (SEAC) would welcome any early comments, by 18 May 2015, to assist them in the first discussions of the restriction proposal.

### GENERAL REMARKS

The Annex XV restriction report, prepared by Poland, has been published on ECHA's website. A public consultation on the proposed restriction is open for a period of six months<sup>2</sup> to allow stakeholders<sup>3</sup> to submit comments or additional information (such as peer reviewed articles or monitoring data) relevant to the proposal. Specific questions on certain aspects of the proposed restriction have also been posed. Comments are invited from stakeholders from both the EU and the rest of the world.

An additional, 60 day, public consultation of the draft SEAC opinion will be held at a later stage of Committee opinion making.

The opinions of RAC and SEAC will take into account the comments received in the public consultation. ECHA will publish the comments on its website received once a month during the duration of the consultation and then reply to these comments and publish the responses, together with the comments of the Committees and Rapporteurs at the end of the process.

More information on the restrictions process can be found at: <http://echa.europa.eu/web/guest/addressing-chemicals-of-concern/restriction>

It should also be understood that:

- In case there is little information on costs submitted during public consultation, SEAC will understand by this that the concern from industry is low and that the Restriction could normally be considered proportional.
- Where derogations have been proposed by the Dossier Submitter, which have been fully assessed in the Annex XV dossier, they are within the scope of the

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<sup>1</sup> The information note has been prepared based on the Annex XV report.

<sup>2</sup> The duration of the public consultation is six months according to Article 69(6) of REACH.

<sup>3</sup> Those most likely to be interested are companies, organisations representing industry or civil society, individual citizens, as well as public authorities.

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proposal and will be assessed by RAC and SEAC. Therefore such derogations could potentially be withdrawn, if not sufficiently justified and so it is advised that respondents affected by such derogations give information to either justify the derogation or to withdraw it.

- new derogations may also be added during the opinion making if they are fully justified through either risk or socio-economic arguments.

## SUGGESTED RESTRICTION (SCOPE)

Poland has submitted a report proposing a restriction on the placing on the market for supply to the general public of Methanol:

- as a constituent of windshield washing fluids in concentrations equal to or greater than 3.0 % by weight,
- as an additive to denaturated alcohol (methylated spirit, denaturated alcohol, brenn spiritus) in concentrations equal to, or greater than 3% by weight.

According to the restriction proposal, Member States may maintain any existing and more stringent restrictions for methanol.

No derogations are proposed.

The restriction is proposed to apply three months after the date of entry into force.

## REASONS FOR ACTION

Targeted risks in this restriction are acute poisoning occurring among alcoholics drinking windshield washing fluids and denaturated alcohol containing methanol at high concentrations. These products represent the most common cause of severe methanol poisoning with a high rate of fatal cases.

Windshield washing fluids and denaturated alcohol are consumed as a surrogate of ethanol by individuals chronically abusing alcohol. This situation is encouraged by the difference in price between ethanol and methanol-containing products as well as by the relatively limited availability of consumable alcohol in some EU countries.

The population who faces the risks lives mainly in countries located in the northern and central parts of the EU where there is a culture of strong alcohol drinking. However, cases of acute poisoning with methanol-containing products have been also noted in southern countries among people originally from central Europe. Based on the analysis presented in the Annex XV report, it is concluded that a restriction at a EU level is the most appropriate measure to address the identified risks.

## CONSEQUENCES OF THE ACTION

The proposed restriction is expected to reduce the poisoning cases related to the ingestion of methanol-containing windshield washing fluids and denaturated alcohol by consumers. Alternatives to methanol with similar performance are available on the market.

The costs of the proposed restriction, mainly concerning substitution of methanol, are expected to be passed down the supply chain to consumers. A complete cost-benefit

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analysis has not been possible to carry out due to the lack of data mostly related to the economic impacts.

### SPECIFIC INFORMATION REQUESTED

A few specific elements have been addressed in the Public Consultation in order to gather relevant information, if available, from stakeholders:

#### Question 1

According to the restriction report, poisoning cases by incidental ingestion of methanol are more frequent in the northern and central parts of Europe. However, cases of incidental methanol poisoning have been also reported in other parts of Europe. Do you have information on the number of poisoning cases in your country by incidental ingestion of methanol?

#### Question 2

Could you provide any case reports of methanol poisoning in which methanol dose and health outcome was stated? Full-length published papers on case reports of methanol poisonings as well as unpublished reports of methanol poisoning from Poison Control Centres or other health care institutions would be appreciated.

#### Question 3

The restriction report proposes a three month transition period for the application of the restriction since its entering into force. Do you have information whether a longer transition period would be required by producers and/or suppliers to adapt to the proposed restriction?

#### Question 4

Could you provide information on potential substitutes for methanol, specifically on ethanol and isopropanol, regarding their price and market volume (gross turnover)?

#### Question 5

The proposed restriction is addressed to the supply to the general public of methanol-containing windshield washing fluids and denaturated alcohol. Could you provide information on the market volumes of these two products in the EU?

### COMMENTS PREFERABLY BY 18 MAY

The opinion forming process of the ECHA Committees for Risk Assessment (RAC) and Socio-economic Analysis (SEAC) starts with a public consultation on 18 March 2015. Interested parties can comment on the proposed restriction report using the ECHA website. Although the public consultation concludes on 18 September 2015, the rapporteurs of RAC and SEAC would appreciate receiving comments by 18 May 2015 to assist them in the detailed discussion of the restriction proposal in June 2015.

The final opinions of both Committees are scheduled to be available by March 2016. ECHA will send these two opinions to the European Commission, which will take the decision whether to include the proposed restriction in the Annex XVII of the REACH Regulation.

**Please note: Information arriving after the closing date of the PC (via other channels e.g. emails) will not be taken into account by RAC/SEAC.**