



To the attention of:

Ms Ursula von der Leyen, President of the European Commission

Ms Stella Kyriakides, Commissioner for Health and Food Safety (DG SANTE)

Mr Stéphane Séjourné, designate Executive Vice-President for Prosperity and Industrial Strategy

Re: Reclassification of ethanol under the Biocidal Products Regulation

08 November 2024

Dear President von der Leyen, dear Commissioner Kyriakides, dear Commissioner-designate Sejourné,

We are contacting you on behalf of [A.I.S.E.](https://www.aise.eu), the detergents and maintenance products industry association, to **bring to your attention** a matter of major importance for public health and our industry: the **potential reclassification of ethanol as a Carcinogen and Reproductive Toxicant Category 1 or Category 2.**

As you may be aware, extensive discussions on this matter have taken place in recent months in the Biocidal Products Committee, in the context of the risk assessment of ethanol as a biocidal active substance.

Ethanol is one of the most important ingredients used safely worldwide in numerous applications on surfaces and skin, including detergents and biocides, without significant risk of carcinogenicity or reproductive toxicity. Amongst its functionalities, it provides broad-spectrum disinfection that is essential for health and safety. Ethanol is in fact known for its ability to kill a wide range of microorganisms, including bacteria, viruses and fungi, and played a key role in the fight against SARS-CoV-2. The use of ethanol in skin and surface disinfectants ensures that they provide both cleaning and disinfecting action, offering comprehensive hygiene benefits in a single product. Ethanol is also an important ingredient in other products/sectors, having a range of functions, such as solvent in surface cleaners and pest control products.

It is crucial to emphasize that this proposed reclassification could have significant implications for healthcare professionals, vulnerable groups, and Europe's competitiveness. According to the World Health Organisation (WHO), hand hygiene campaigns promoting the use of ethanol-based hand sanitisers have halved the number



of healthcare-associated infections (HCAIs) in Europe, but according to the European Centre for Disease Prevention and Control (ECDC) these infections still cause over 3.5 million HAIs annually in the European Union and European Economic Area (EU/EEA), leading to more than 90,000 deaths and approximately 2.5 million disability-adjusted life years (DALYs). If ethanol were classified as a CMR, ethanol-based sanitisers could no longer be used (including in hospitals), which would reverse this improvement.

The proposal to classify ethanol could prevent its usage by the general public and professional users where **no suitable alternatives** exist that are efficacious against non-enveloped viruses such as SARS-CoV-2, polio, plantar warts and norovirus.

Given the exceptional nature of the Biocidal Products Regulation active substance approval dossier for ethanol and its extensive implications for society and multiple sectors, **we ask for your urgent intervention on this critical matter**. The proposed classification could lead to the removal of essential products from the EU market, thereby posing serious public health risks for EU citizens.

A.I.S.E. would like to request a meeting with you to discuss this important issue and explore practical solutions. We welcome your focus and commitment to improving European citizens' health and revamping Europe's competitiveness, therefore we kindly ask you to address this as a matter of priority for the industry and its whole value chain.

We thank you for considering our request and look forward to the possibility of discussing it further.

Yours sincerely,

Alexis Van Maercke
A.I.S.E. Director General

Yours sincerely,

Florian Vernay
A.I.S.E. President

About A.I.S.E.

A.I.S.E. represents the detergents & maintenance products industry in Europe. Based in Brussels, A.I.S.E. has been the voice of the industry to EU regulators since 1952. Membership consists of 29 national associations across Europe, 19 corporate members and 23 value chain partners. Through this extensive network, A.I.S.E. represents over 900 companies supplying household and professional cleaning products and services across Europe. Committed to promoting sustainable practices and innovation, A.I.S.E. collaborates closely with European institutions, industry stakeholders, and the public to enhance the sector's environmental protection, consumer safety, and regulatory compliance efforts.

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