



Bundesanstalt für Arbeitsschutz
und Arbeitsmedizin

Federal Institute for Occupational
Safety and Health

Minority opinion of the German CA regarding the Union authorisation application for a product family containing CMIT/MIT discussed at BPC-34

The German Competent Authority identified that the application for use of the products of the biocidal product family as preservative in fuels conflicts with national German legislation (10th Federal Emission Control Ordinance §2 (1) and (2)) as the active substance CMIT/MIT contains chlorine which causes the formation of dioxin during combustion. According to this national legislation, it is prohibited that fuels for motor vehicles (on-road) contain additives with chlorine or bromine compounds. The placing on the market of additives that contain chlorine or bromine compounds is also prohibited:

1) Fuels for motor vehicles in the sense of § 1(2) of the Road Transport Act [StVG] may only be placed onto the market commercially or as part of commercial undertakings if they do not contain any chlorine or bromine compounds as additives.

2) Paragraph 1 prohibits placement of chlorine or bromine compounds as fuel additives onto the market commercially or as part of commercial undertakings.

(The latest draft in English can be found under notification 2019/189/D).

The German CA is also of the opinion that any kind of combustion is thought to cause the formation of dioxins (PCDD) and other chlorinated hydrocarbon compounds. PCDDs are classified as "Persistent Organic Pollutants" (POPs).

As the dioxin burden on humans and the environment needs to be further reduced and the formation and emission of POPs should be avoided, the application "preservation of fuels" should not be authorised.