

Committee for Socio-economic Analysis (SEAC)

**Response to comments on the SEAC draft
opinions on the Annex XV dossier proposing
restrictions on
Dimethylfumarate (DMFu)**

ECHA/SEAC/RES-O-0000001412-86-03/F

Dimethylfumarate (DMFu)
EC number: 210-849-0
CAS number: 624-49-7

14 June 20

Substance: **DMFu**
CAS number: **624-49-7**
EC number: **210-849-0**

Comments and response to comments on SEAC draft opinion on Annex XV restriction dossier proposing restriction on **Dimethylfumerate**
Annex XV report submitted by France 15 April 2010.
Public consultation on SEAC draft opinion started on 17 March 2011.

Ref	Date Country/Org./MSCA	Comment	Response
	2011/05/17 Spain / Industry or trade organisation	<p>In our view, and according to our experience with DMFu in the footwear sector, we support the permanent ban on this substance. DMFu is a powerful biocide that prevents mould formation in goods during transportation and storage. It was often found inside dessicant sachets that had been placed into the boxes of imported footwear. In 2008, in Spain, the Footwear Technological Institute (INESCOP) developed an analytical test method for the determination of DMFu content in footwear, in response to the various allergy incidents detected. Since then, numerous DMFu analyses in footwear have been carried out while the test method has been improved. Coinciding with the temporary ban on DMFu, the amounts of DMFu detected in footwear have been and still are negligible. The European Standardisation Committee CEN/TC309 "Footwear" is currently working on the drafting of a European standard test method for the determination of DMFu content in footwear. Therefore, in addition to the social-economical considerations, we believe that the permanent ban on DMFu can go forward because, on the one hand DMFu can be detected through analytical methods that will soon be standardised at a European and international level and, on the other hand DMFu absence in footwear for several months now proves that it can be avoided for this use.</p>	<p>Thank you for this information.</p>

Ref	Date Country/Org./MSCA	Comment	Response
	2011/05/06 Germany / Member State	We agree with the conclusions in the draft opinion.	Thank you for your comment.
	2011/03/31 United Kingdom /International NGO	ClientEarth welcomes this restriction and hopes, for the future that the European Union, will use a precautionary approach in keeping articles using substances on the market that may have serious health effects as DMF.	Thank you for your comment.