

30th May 2025

Quality Notification

Product Discontinuation

Contec 70% Denatured Ethanol Bottled Products

Dear Distributor

We regret to inform you that, due to the recent enforcement of excise regulations on alcohol by French Customs Authorities, **Contec are compelled to indefinitely suspend the deliveries of Contec Denatured Ethanol bottled products to the European Union.** This decision is necessary to ensure compliance with legal requirements and Contec's policy to always pursue integrity.

Additionally, we considered the ongoing uncertainty on future (non-)approval of ethanol as an active substance for use in PT2 hard surface disinfectants per the Biocidal Products Regulation (BPR).

Background to change

EU Excise Regulations

Excise goods are goods subject to a specific consumption tax across the European Union called excise duties. The excise regulation is harmonized at European Union level providing a common regime for excise products across all EU Member States.

In France, goods exceeding 1.2% ethyl alcohol and not contained in a beverage are an alcoholic product subject to excise duties. Contec 70% Denatured Ethanol trigger and capped products contain more than 1.2% ethyl alcohol and are automatically subject to excise duty by French Customs implementing EU excise regulation.

Excise duties become due for any excise goods produced, imported or introduced into the EU if they do not have a pre-authorised reason for exemption.

The exemption of excise duties for denatured alcohol

There is a specific excise duties exemption when the ethanol present in a product is denatured in a way to prevent human consumption of the ethanol. However, the benefit of said exemption is strictly supervised within the excise regulation in order to prevent fraud. It is subject to compliance of two cumulative conditions:

1. The incorporation into a product not intended for human consumption
2. A denaturation following an authorized and approved process

Regarding the second condition, the manufacturer has the choice to make:-

- Totally denatured alcohol (CDA) using the EU approved eurodenaturant formulation containing isopropyl alcohol, methyl ethyl ketone, and denatonium benzoate (Bitrex).
- Partially denatured alcohol by pre-approved formula by your Customs Administration.

The second option requires the producer or importer of the alcohol containing products to submit an application to the relevant customs authority setting out the process by which the ethanol is denatured and requesting this process to be approved as a “special denaturation process”.

Please note that an authorization for denaturation obtained in another (EU) country does not automatically meet the criteria set by in our case the French excise regulation. There is no agreed EU list of acceptable partially denatured alcohols. Also, most countries will not publish a list of the partially denatured alcohols that they will accept. An application must be made to each customs authority for approval.

Outside the two scenarios, exemption criteria are not met and excise duties will be due for the production or import of alcohol containing products (in Contec’s case in France).

Contec denatured ethanol product are clearly not intended for human consumption. However, the option to utilize the eurodenaturant formula is unfeasible as it brings risk of residue in cleanroom environments. Additionally, our request for special authorization of ethanol denatured with 5% IPA from French Customs Administration was denied. It was denied despite Contec formulation being recognized as Trade Specific Denatured Alcohol by the UK customs authority (TSDA 7). Regardless, our product cannot be classified as denatured alcohol under current EU excise regulations and is subject to excise duties upon importation into the EU.

Continued import of Contec 70% Denatured Ethanol product into our warehouse in France will be subject to an 80-130 euros excise duty per case. Any import of our product in France without further licenses will trigger both this tax and potential criminal liabilities in case of a Customs audit. Liability may also apply for import to other EU Member States.

The excessive nature of the extra cost will require a significant price increase to our customers which we believe is commercially unviable.

Products affected by this change

Contec 70% Denatured Ethanol bottled products manufactured in the UK.

Part Number	Description
SBT0570DEW	Contec Sterile 70% Denatured Ethanol, Trigger Spray, 0.5L
SBT170DEW	Contec Sterile 70% Denatured Ethanol, Trigger Spray, 1L
SBC570DE	Contec Sterile 70% Denatured Ethanol, Capped, 5L
FBT170DE	Contec 70% Denatured Ethanol, Trigger Spray, 1L
FBC570DE	Contec 70% Denatured Ethanol, Capped, 5L

Timescale

Unfortunately, this discontinuation will take place with immediate effect as for the reasons outlined we are unable to ship any more denatured ethanol into France for distribution within the EU and EEA. Once the existing stock in Vannes is depleted there will be no further denatured ethanol available.

Regions affected

This discontinuation will apply to the 27 EU member countries and the EEA countries of Norway, Iceland, Liechtenstein and Switzerland.

Alternative Products

Contec manufactures an identical range of 70% isopropyl alcohol solutions. There is no difference in the efficacy or contact times of 70% isopropyl alcohol and 70% denatured ethyl alcohol when used as a hard surface disinfectant for bacteria, fungi and moulds.

Please do not hesitate to contact us if you require further information on the 70% IPA range or samples to provide to end users.

Part Number	Description
SBT0570IW	Contec Sterile 70% IPA, Trigger Spray, 0.5L
SBT170IW	Contec Sterile 70% IPA, Trigger Spray, 1L
SBC570I	Contec Sterile 70% IPA, Capped, 5L
FBT170I	Contec 70% IPA, Trigger Spray, 1L
FBC570I	Contec 70% IPA, Capped, 5L

We appreciate that this is a difficult situation and we would normally endeavour to provide additional notice but given the circumstances, that is not possible. Contec have explored every possible avenue to resolve the issue, but our choices were limited to a product unfit for cleanroom use, burdensome administrative complexities or a commercially unviable product due to pricing.

As customs enforcement continues, there is a possibility that other cleanroom ethanol products denatured with 5% IPA will also be withdrawn from the market.

If you require additional information concerning this notice or more information for an end user, please do not hesitate to contact us. Our technical and commercial teams are on standby to help explain this situation to your end-users. We appreciate your understanding and support. For any questions or concerns, please do not hesitate to contact us.

Yours sincerely,



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Clean counts most