Annual Review
2022

"Expert and balanced information about cleaning and hygiene"
Table of contents

The links below will take you directly to each section, there are also arrows at the bottom of each page to move to the next/previous page.

3 Chair’s review 2022
4 An introduction to UKCPI
5 UKCPI members 2022
6 Member benefits
7 Advocacy, Regulatory and Communications (ARC) committee
12 UKCPI Council and Committees 2022
13 External contacts and stakeholders
14 UKCPI team
When taking over the Chair of UKCPI some 12 months ago, who could have predicted the challenges and changes we have all experienced as individuals and businesses in that short time?

Let’s not forget that these current issues affecting energy costs, supply chain availability and consumer confidence come on top of business uncertainty arising from our exit from the EU and of course the pandemic.

The role of the UKCPI throughout has been to provide a steady source of regulatory advice and guidance to members as well as to ensure we have a voice on proposed legislation.

We are now seeing the UK Government review the EU legislation it adopted into UK Law – consultations occurred throughout the year and I am pleased with how UKCPI sought members’ input and then made representation to officials as well as submit robust responses to these consultations.

Whilst the focus of UKCPI work is UK rather than EU, it remains well connected to our European association AISE in order to be able to advise members on EU regulations that still apply in Northern Ireland as well as monitor developments in Europe which, whilst not applicable to the UK, may well be mirrored in future UK legislation.

I would like to highlight a few areas, outside their usual remit, that UKCPI took on successfully. Firstly, their identification and then full involvement in areas critical to members but not strictly in the association’s remit – namely the incoming Extended Producer Responsibility scheme; single use plastics and proposed restrictions that could apply to wet wipes and even a government proposal to re-introduce imperial measures!

Looking to the wider community our partnership with RoSPA (The Royal Society for the Prevention of Accidents) promoting the safe storage of cleaning products in the home has grown to cover 29 areas of the UK, reaching over 500,000 families. This is a remarkable achievement especially given that COVID restrictions reduced the face-to-face briefings with the local public health networks.

In addition to this public health campaign reaching out to families, UKCPI’s primary school pack ‘Staying safe with Sam’ was made available to all UK schools at the beginning of this academic year – an engaging pack that allows teachers to raise awareness of household products directly with young children.

I believe UKCPI punches way above its weight due to its strong relationships with key officials, an excellent network of other associations and stakeholders to call upon for support and a thorough understanding of its members’ needs.

It seems that never-ending challenges are now the new business norm and it is reassuring in UKCPI and in its member-driven committees we have the experience and expertise to support all its members, from SMEs through to multinationals.

Robert Keeling
Managing Director,
Airpure International Ltd

Robert Keeling
Chair of UKCPI Council
An introduction to ukcpi

What is the UKCPI?
The UK Cleaning Products Industry Association (UKCPI) is the leading trade association representing UK producers of cleaning and hygiene products from soap, laundry detergents, fabric conditioners, hand and machine dish wash, household disinfectants, air care and polishes, to the professional cleaning and hygiene products used in industrial and institutional applications. Membership is open to companies that manufacture or market cleaning products in the United Kingdom.

We estimate that our membership includes over 98% of UK consumer product manufacturers and over 60% of UK professional cleaning and hygiene product manufacturers.

What we do

Industry representation
• UKCPI represents its members’ interests directly to UK Government departments, stakeholders and academic bodies to ensure practical and sensible formulation and then application of UK policy and regulation
• Through membership of AISE (Association for Soaps, Detergents and Maintenance Products), UKCPI ensures that UK members are kept aware of regulatory changes at a European level, which are still relevant to Northern Ireland.

Advice and guidance
• Provide valuable advice and guidance to members regarding current and forthcoming legislation and regulation
• Organise regional meetings and workshops to keep members up-to-date on technical and regulatory developments and issues
• Give individual help to members on a daily basis, especially regarding technical and regulatory affairs
• Maintain a comprehensive members extranet covering legal and regulatory requirements
• Manage an EU Workability forum to identify and address issues of specific concern following EU exit

Authoritative industry voice
• Provide the industry voice for its members to the media and outside organisations, both directly and through its website: www.ukcpi.org

The UK market

“Expert and balanced information about cleaning and hygiene”

www.ukcpi.org
UKCPI members 2022

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UKCPI members benefit from a range of services including free meetings and seminars, individual support and guidance, newsletters and a private extranet updated every month.

**Technical and regulatory support and guidance**
All members have direct access to the Technical Manager on a one-to-one basis and this service continues to be well used, particularly on post-EU exit scenarios.

Key issues such as labelling and biocide regulations are a frequent topic and this reflects the number of ongoing changes in the legislation that members have to keep up with.

Feedback from companies showed that the work of the association on these issues was a major factor for membership satisfaction.

**Advocacy**
Of great value to members is UKCPI’s access to and credibility with officials and policy makers. This often means UKCPI is asked to meet and contribute to Government thinking on regulations post EU exit prior to initiatives being fully developed, which has been essential during 2022.

“UKCPI works regularly with a number of Government departments and stakeholder groups to promote members’ interests.”

**European link**
UKCPI staff are directly linked to the European association AISE at key points and in many of the working groups. This strong relationship with AISE continues to be important as members operate in both UK and EU markets.

**Regional Meetings and EU Workability Forums**
Following discussions with members, this year’s Regional Meetings were replaced by a series of online EU Workability Forums. These were an opportunity for members to share their experiences or concerns on issues related to the UK’s exit from the EU. This included issues such as transportation and tariffs that were out with the usual scope of the association’s activities.

**Newsletter and monthly email update**
A monthly email newsletter provides members with updates on UKCPI activity, legislative and regulatory news, details of forthcoming meetings and events, and a summary of relevant news stories that have appeared in the media each month.

**Members’ extranet**
The extranet allows UKCPI members to search for the latest updates on issues covered by UKCPI, AISE and the various committees. Tracking of UKCPI meetings, issues and position papers is also available for members here. A monthly email summarises the latest documents uploaded to the extranet and allows members to click through and log in.
Advocacy, Regulatory and Communications (ARC) committee

The ARC committee encompasses advocacy, regulatory and communications work. This allows for technical, advocacy and communications experts to sit together and gives UKCPI a strong basis on which to assess and then address a range of topics – some of which are demonstrated below.

Advocacy
UKCPI’s value to its members is its access to and credibility with officials and policy makers. This often means that UKCPI is asked to meet and contribute to Government thinking prior to initiatives being fully developed. Throughout 2022, UKCPI worked with a number of Government departments and stakeholder groups to promote members’ interests.

EU exit
Throughout the year UKCPI continued to address members’ questions and concerns over the application of regulations since leaving the EU. Our own members’ ‘EU exit workability forum’ played a key role in understanding and sharing concerns. This progressed to a focus on issues related to Northern Ireland’s unique position with respect to regulations and in particular addressing concerns over the application of CLP and labelling obligations.

UKCPI’s membership of the Defra Chemicals Policy and Communications Forum (CPCF), which meets every two weeks, ensured that members were kept up to date on regulatory developments and had their views and concerns heard by Defra officials.

One such development came in response to industry concerns over UK Reach registration deadlines and data requirements. Together with the Alliance of Chemical Associations (ACA) our industry advocacy resulted in Defra led work streams to look at data requirements – known as the Alternative Transitional Registration Model for UK Reach. UKCPI continues to feed into this through an ACA technical working group.

UKCPI also participated in the recent Defra consultation on extending the current Reach registration deadlines – at the time of writing the consultation result is not known but the intention is to ensure legislation is changed in 2023 to extend the current registration deadlines.

A final consultation of the year to which UKCPI responded was that from BEIS and OPSS on ‘Choice on units of measurement’, essentially seeking views on the reintroduction of imperial measurements.

Single use plastic
Throughout the year the issue of single use plastic and environmental pollution was high on the media agenda and saw the devolved nations reviewing policies to restrict or ban the inclusion of plastic in wet wipes.

UKCPI worked with members to produce a comprehensive briefing pack that was used to explain the benefits of retaining plastic in wipes for certain uses whilst also seeking greater consumer education on the correct disposal routes for wet wipes such as non flushable wipes. We also briefed officials on the contribution that sewage disposal plants have in relation to releases of wet wipes into the environment.

Our position was shared with the Absorbent Hygiene Product Manufacturers Association (AHPMA), the Cosmetic, Toiletry & Perfumery Association (CTPA) and the nonwovens association EDANA for a consistent industry response.

UKCPI responded to the Welsh Assembly’s consultation on extending their ban on single use plastics to include plastic containing wipes; the Scottish Government consultation on marine litter and Defra’s call for evidence on wet wipes. UKCPI also met with Fleur Anderson MP who had introduced a 10 minute rule bill to ban plastic in wipes. It was announced by the Welsh Assembly in September 2022 that they would not be extending their single use plastic ban to included plastic in wet wipes and that they would work with industry to seek more evidence.

Advocacy, Regulatory and Communications (ARC) committee
Extended Producer Responsibility for packaging (EPR)

Following consultation and industry concerns, the new EPR scheme will be delayed by one year and phased in from 2024. Nonetheless it will still move the full cost of dealing with household packaging waste away from local taxpayers and councils to the packaging producers with a reported cost of nearly £2 billion. Recent announcements stated that the EPR scheme would continue to be run by local authorities rather than a body representing the ‘obligated producers’ i.e. those that will fund the new scheme.

Throughout the year UKCPI supported the packaging industry association (INCPEN) as well as The Food and Drink Federation (FDF) and The British Retail Consortium (BRC) to make the case to Ministers for a rethink on the EPR and for greater involvement of the industry in a future scheme.

Regulatory

As a result of the UK’s exit from the EU, it now operates under its own chemicals regulatory regime. Initially this is based on ‘lifting and shifting’ the retained EU legislation and making changes that make it workable in the UK. UKCPI has been keenly monitoring developments and, where appropriate, has submitted industry comments to government officials. For at least the first four years after exit, Northern Ireland will continue to follow EU regulations under the Northern Ireland Protocol.

Regulation on Classification, Labelling and Packaging of substances and mixtures (CLP)

As part of the Chemical Strategy for Sustainability, the European Commission set in motion the revision of CLP and a Delegated Act on the new hazard classes was published and notified to the WTO in September. A further Act covering the revision on the Regulations is also expected in 2022.

Overall the main areas under revision in the two Acts are:
• the possible introduction of new hazard classes such as Endocrine Disrupting Chemicals (EDCs) and Persistent Bio-accumulative and Toxic (PBT);
• improving Classification for both CLH and self-classification;
• labelling issues around fold out labels and small packaging;
• hazard communication and enforcement for online sales;
• the scope of the Regulation;
• improvements to Annex VIII;
• and applicability and transitional periods

In the UK, a mandatory classification table was established by the Health and Safety Executive (HSE) and is now being updated. For this HSE published a Technical Report which may or may not aligned with the RAC opinion. HSE then publish their opinion on the substance within 12 months. They have from then 12 months to recommend a revised classification to ministers. After the minister approves the change it will be amended on the CLP Mandatory Classification Table and will include an entry into force date. This date will be set to allow industry time to respond and, although expected to be 18 months, it is not set in stone.

During the year it was announced that Annex VIII (harmonised reporting to poison centres) had in fact been accidently retained in GB legislation. A consultation to amend this has been proposed but advice from both NPIS and DHSC is to continue with the GB voluntary approach but noting that the new system remains for Northern Ireland.

Review of the Detergents Regulations

In Europe the Commission continues to review the Detergent Regulation and has in fact expanded the scope of the revision. AISE continues to lobby on behalf of industry and responded to the public consultation during the course of the year.

The Commission consultation posed questions on the following topics that are expected to be included in the revision:
• Dosage instructions
• Refill sale of detergents
• Ambiguous definitions
• Microbial cleaning products
• Information to poison centres and ingredients data sheets
• Phosphorous limitation and biodegradability of non surfactant organic ingredients
• Overlaps in the labelling of ingredients
Additionally, discussions with the Commission have also been held on topics such as the labelling of fragrance allergens, link to the pharmacos website and the biodegradability of the soluble film.

In the UK there have been no changes to the regulations so for the moment we remain aligned, but this will change when changes are adopted at the EU level.

**Biocidal products**

Following the end of the EU exit transition period on 31 December 2020, the EU Article 95 list of biocidal active substance suppliers is no longer applicable in Great Britain (England, Wales and Scotland). Under the GB Biocidal Products Regulation (GB BPR) Great Britain maintains its own, independent list of biocidal active substance suppliers, referred to as the GB Article 95 list. Biocidal active substance and product suppliers included on the EU Article 95 List on 31 December 2020 were automatically added to the GB Article 95 List. To remain on the GB Article 95 List, suppliers must submit information to HSE by 31 December 2022. Suppliers that fail to submit the relevant information to HSE by 31 December 2022 will be removed from the GB Article 95 List during 2023.

For existing UK biocidal product authorisation holders that were valid in the UK on the 31 December 2020, companies need to ensure that they’re established in the EU for that authorisation to remain valid in NI. Companies need to tell HSE that either they’re established in the EU – as soon as possible – or that they no longer want to hold an authorisation in NI.

**Other legislative areas / horizon monitoring**

The UKCPI Advocacy, Regulatory & Communications Committee actively monitors other legislative areas, such as cosmetics, aerosols and perfumes, for issues that could influence our product categories.

To keep up-to-date on issues relevant to our industry, UKCPI regularly liaises with the Defra Chemicals Policy & Communication Forum, DfT UN transport briefings, HSE GHS Stakeholders Group and the Environment Agency Chemical Industry Liaison Group throughout the year.

UKCPI Technical Manager Steven Stewart is in regular contact with technical managers in other industry trade associations. Furthermore, our Director General, Philip Malpass, sits on the Alliance of Chemical Associations (ACA), which represents the majority of the UK chemicals industries, as well as the Chemicals Stakeholder Forum run by Defra.

**Communications**

**Take Action Today, Put Them Away campaign**

The Take Action Today, Put Them Away campaign, which is run in partnership with the Royal Society for the Prevention of Accidents (RoSPA), continued to work to reduce the number of children involved in incidents of accidental exposure to cleaning products in the home.

UKCPI and RoSPA rolled out the 2022 programme via virtual launches, together with partners from local councils and public health teams, who offered excellent feedback on the campaign saying that parents loved the magnetic pad and checklist and that health visitors had successfully embedded the campaign into their working practices.

In 2022, launches were held in Plymouth, Staffordshire and Bath and North East Somerset. The campaign has gone from strength to strength since its first launch in 2013, and has now reached 29 areas of the UK, where over 500,000 families have been helped to prevent poisoning and eye injuries.
Staying Safe with Sam
In September, to coincide with the new school year, UKCPI’s Staying safe with Sam educational material was made available to all UK schools. The free resources teach children about keeping safe around cleaning products and include a story book, a teacher’s handbook and fact sheet for families.

Indoor Air Quality
The topic of Indoor Air Quality continued to be monitored by UKCPI with notable studies on cleaning products and Indoor Air Quality from universities including York and Indiana. Indoor Air Quality and NMVOC levels form part of the government’s Clean Air Strategy and UKCPI continues to work with Ricardo, the consultancy tasked by DEFRA to maintain the National Atmospheric Emissions Inventory (NAEI) to ensure that it accurately reflects our sector’s contribution.

Recycling awareness
UKCPI supported WRAP’s annual Recycle Week in October on social media, to raise awareness of the importance of recycling cleaning product packaging. This year the campaign reminded consumers that their recycling really does make a difference.

EU exit communications
As the UK moved beyond the EU exit transition period, UKCPI kept members appraised of the evolving rules and regulations via the monthly members’ newsletter, email alerts and the members’ area of the website.

UKCPI news & updates
January | 2022

UKCPI meetings

Deadline for UK REACH to be extended
Defra says it has committed to exploring alternative arrangements for UK REACH transitional registrations. More details.

Changes to rules of origin requirements between EU and UK - supplier declarations
January 2022 brought about some changes with regards to the requirements for rules of origin, for goods going between the UK and the EU. Previously, to prove origin, businesses have been allowed to get supplier declarations on origin after exporting goods, but now supplier declarations will be required at the time of export.

Defra call for evidence on commonly littered single-use plastic items including wet wipes
UKCPI will be responding to Defra’s call for evidence on proposals to introduce regulatory options to address wet wipe litter, which causes so many problems. Thanks to the members who have already...
Social media
UKCPI published key messages to audiences on both Twitter and LinkedIn throughout the year, a snapshot of which is illustrated below.

Event partnerships
In 2022, UKCPI supported a number of international events which raised its profile and secured discounts for UKCPI members. March saw a partnership with Cleaning Products Europe 2022 in Prague, in July UKCPI was a supporting association at the International Convention and Exhibition on Home and Personal Care Products and Ingredients in Goa and in September UKCPI supported the Second Annual Sustainable Homecare Products Forum in Frankfurt.

Communications network
UKCPI’s communications officer, Charlotte Salter, participates in AISE’s Commsnet network of communications professionals across Europe, as well as AISE’s Communications Steering Group and Hygiene Communications Task Force. Participation in these networks enable a useful exchange of information and best practice knowledge, as well as training in new communications tools.
UKCPI Council
Rob Keeling, AirPure (Chair)
Ian Croft, Robert McBride (Vice chair)
Tony Appleton, Procter & Gamble UK & Ireland
Charlie Beevor, Unilever UK & Ireland
Claudia Berto, Henkel UK
Neil Bolton, Procter & Gamble UK & Ireland
Mark Cunningham, PZ Cussons (UK)
Rhian Eckley, Unilever UK & Ireland
Gareth Edwards, Acdoco
Rob Fenton, Dri Pak
Rowland Furse, Reckitt
Graham Horne, Astonish
Kostas Kotsanopoulos, Diversey
Philip Malpass, UKCPI (Secretary)
Ania McClafferty, Unilever UK & Ireland
Ed Whittle, SC Johnson
Peter Woodhead, Selden (ARC rapporteur)

UKCPI Legal panel
The UKCPI legal panel in 2022, consisting of Tony Appleton and Ania McClafferty, continued to advise UKCPI on any legal matters concerning the industry.

Advocacy, Regulatory & Communications Committee 2022
Peter Woodhead, Selden Research (Chair)
Helen Fenwick, Unilever UK & Ireland (Vice-Chair)
Claudia Berto, Henkel UK
Marina Bishop, NicePak International
Andy Brack, PZ Cussons UK
Rowland Furse, Reckitt
Mark Henry, Mirius
Andrew Hill, Robert McBride
Tony James, ACDOPRO
Nancy Katsoulis, Procter & Gamble UK & Ireland
Kostas Kotsanopoulus, Diversey
Philip Malpass, UKCPI
Christine Mammah, S C Johnson
Stephen McKay, Greyland Limited
Fiona Nortje, Unilever UK & Ireland
Yash Parulekar, Kuraray
Dainius Plepys, Clorox
John Pickup, Consultant
Charlotte Salter, UKCPI
Steven Stewart, UKCPI
Lauren Thompson, Reckitt
External contacts and stakeholders

In addition to a specific external affairs programme to meet and brief a number of key groups and opinion formers throughout 2022, UKCPI worked closely with government departments, other trade associations, NGOs, external stakeholders and the media on matters of common interest.

These have included:

- Allergy UK
- Alliance of Chemical Associations (ACA)
- American Cleaning Institute (ACI)
- Association for Soaps, Detergents and Maintenance Products (AISE)
- Asthma UK
- British Aerosols Manufacturers Association (BAMA)
- British Chemical Association (BCA)
- British Brands Group
- British Cleaning Council (BCC)
- British Coatings Federation (BCF)
- British Plastics Federation (BPF)
- British Retail Consortium (BRC)
- British Standards Institute (BSI)
- Chemical Business Association (CBA)
- Cleaning Products Europe
- UK Chemicals Stakeholders Forum (CSF)
- Child Accident Prevention Trust (CAPT)
- Cleaning Industry Liaison Forum (CILF)
- Confederation of British Industry (CBI)
- Cosmetics, Toiletry and Perfumery Association (CTPA)
- Department for Business, Energy and Industrial Strategy (BEIS)
- Department for Environment, Food and Rural Affairs (DEFRA)
- DEFRA’s Chemical policy / EU exit forum
- Department for International Trade, chemicals round table
- Department for Transport (DfT)
- Environment Agency Chemicals Liaison Group
- Euromonitor
- Health and Safety Authority (Ireland)
- Health and Safety Executive Committees (HSE)
- Health and Safety Laboratories (HSL)
- Home Office
- Indian Home & Personal Care Industry Association
- Industry Council for Packaging and the Environment (Incpen)
- International Fragrance Association (IFRA UK)
- International Network of Cleaning Product Associations (INCPA)
- International Scientific Forum on Home Hygiene (IFH)
- Inventu Global
- Irish Cosmetics and Detergents Association (ICDA)
- National Poisons Information Service, Birmingham (NPIS)
- Office for the Internal Market (OIM)
- Office for Product Safety and Standards
- Ricardo Consulting
- Royal Society for the Prevention of Accidents (RoSPA)
- Sense about Science (SaS)
- Science Media Centre (SMC)
- Trade Association Forum (TAF)
- UN Sub Committee of Experts on GHS (UNSCoEGHS)
- Waste and Resources Action Programme (WRAP)

All-Party Parliamentary Group (APPG) for the cleaning and hygiene sector

UKCPI is a founding member of the All-Party Parliamentary Group (APPG) for the cleaning and hygiene sector, which was inaugurated on 2 February 2021.

The APPG represents the interests of the cleaning and hygiene sector in Parliament and maintains a dialogue with MPs, ministers and government.

A total of 53 MPs and three Members of the House of Lords have joined the group, making it one of the bigger and most credible APPGs.

Nigel Mills, MP for Amber Valley and who has SC Johnson in his constituency, and Baroness Greengross co-chair the group.

All these organisations contributed to the influence and effectiveness of UKCPI during 2022.
UKCPI team

The UKCPI team is supported by teams of experts drawn from our membership in the fields of technical, regulatory and external affairs. The overall leadership of the UKCPI is provided by the Council made up of industry leaders.

Philip Malpass, Director General
Graduated in marine sciences with a Masters and post graduate research in marine environmental chemistry. Philip has experience of working in communications and external affairs for multinational chemicals and pharmaceutical companies, as well as managing issues and external relations for international alcohol brands.
philip.malpass@ukcpi.org

Charlotte Salter, Communications Officer
Charlotte covers digital media, press office, external and internal communications for UKCPI. She holds a degree in French, Spanish and Italian and has experience in digital and print publishing, having previously worked as a magazine editor for international B2B magazines and websites.
charlotte.salter@ukcpi.org

Steven Stewart, Technical Manager
Steve is responsible for technical and regulatory affairs at UKCPI. He graduated with honours in chemistry and has over 20 years experience in the cleaning products sector.
sstewart@ukcpi.org

Kathryn Dodgson, Personal Assistant/Office Manager
Kathryn is responsible for the smooth running of the UKCPI office as well as UKCPI committees and events. She previously worked for the NHS for over eight years in various roles, including management of NHS pharmaceutical contracts and GP contracts. Kathryn has a degree in English Literature.
secretariat@ukcpi.org