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| Management committee meeting 04/2021 |
| Minutes | Web ConferenceTuesday 20 April 202110:30-15:30 (break from 13h-13h45) |

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| **Participants:***By phone:*Ina Andreasen, RB Walter Aulmann, EcolabIan Croft, McBrideGiorgia De Berardinis, Colgate Palm.Bernd Glassl, IKW Christelle Henry, AfiseAd Jespers, Diversey (Chairman) Gerard Luijkx, Unilever (Vice-Chairman)Eleni Papadimitriou, PGMarten Kops, N.V.Z. Rob Roggeband, P&G *(part.)* Felix Rustemeyer, Henkel Françoise van Tiggelen, DeticEdward Whittle, SC Johnson | *From A.I.S.E.:*Luca ContiSascha Nissen Jan Robinson *(part.)* Giulia SebastioValérie SéjournéMohamed Temsamani *(part.)*Amelie Weber Susanne Zänker *(part.)*ApologiesHans Razenberg, NVZ |

1. WELCOME AND REMINDER OF COMPETITION LAW

The Chair, Ad Jespers opened the meeting by welcoming the attendees to the web-conference. The rules of the Competition law were reminded, and all agreed to adhere.

1. APPROVAL OF MINUTES & REVIEW OF ACTIONS OF LAST MEETINGS (MC 23 March 2021 and Joint MC/ NAC 23 March 2021)

The minutes of both meetings were approved as sent out. As to the actions, they were carried out or will be covered through the agenda.

1. Approval of the agenda

The agenda was approved as sent out.

1. KEY TOPICS (for discussion) (10h50 – 12h30)
	1. Detergent Regulation (G.Sebastio)

An update was given on the topics relating to the Detergent Regulation:

* Labelling of fragrance allergens: Under the Roadmap on fragrance allergens there have been discussions on the proposal to increase the number of fragrance allergens in the Cosmetics Regulation from 26 to 87. The Detergent Regulation will be impacted as there is a direct link between the Detergent Regulation Annex VII and the Cosmetics Annex III.

In February 2021 a draft of a legal text was shared by the Commission Cosmetics WG. This proposal results in the list of fragrance allergens to be listed on-pack to increase to 87 ingredients. Currently the Cosmetics timelines are: 3 years for placing on the market 5 years for withdrawal. The timelines for Detergents are going to be aligned to those agreed for the Cosmetics Regulation through an FAQ. A.I.S.E. is following this topic closely and at the moment collaborating with the Fragrance Industry and Cosmetics Europe to provide technical comments by the end of April.

* Labelling of preservatives: In October 2020 the Commission proposed a delegated act to amend annex VII of the Detergent Regulation and provide clarity on the labelling of preservatives. In particular, the concern of the member states is the labelling of preservatives that are present in other ingredients in the formulation and are carried over at trace levels in the final mixture. Following a consultation between Commission and Member States, the following amendment is being proposed to Section A of Annex VII to the Detergents Regulation to be carried out via delegated act:

“Preservatives shall be listed, using where possible the system referred to in Article 33 of Regulation (EC) No 1223/2009, irrespective of their concentration, if they contribute to the qualification of a constituent of the detergent as a treated article within the meaning of Article 3(1)(l) of Regulation (EU) No 528/2012.”

A.I.S.E. is of the position that this amendment is not proportional and has engaged with the experts of the Detergent WG and the NAC to make comments to this effect. A.I.S.E. engaged with the NAC and sent a statement to Commission on 19 April explaining the amendment lacks proportionality, could lead to over-labelling and “may concern” statements, is against the principle of dose and effect. As a next step A.I.S.E. would engage with the NAC for feedback on member state comments.

Some additional learnings were shared following the recent developments. Based on engagement of A.I.S.E. with member states in relation to the preservatives/fragrances topic, there have been a few learnings extrapolated from the discussions that can apply to the digitalisation.

* There is a gap in the arguments we have regarding what is consumer relevant.
* Elements kept on-pack for enforcement even at the expense of over-labelling
* The principle that dose is related to effect is not always accepted/believed/understood
* On-pack labelling is still seen as the preferred option/ fear of industry removing elements

The duplication and discrepancy arguments are not enough, especially for the member states. Need to show how digitalization can bring added benefits to CONSUMERS and INSPECTORS compared to on-pack.

**ACTIONS:**

* Detergent WG sub-group: call to prepare arguments as to why our preferred options for the future of the Detergent Regulation are better in terms of relevance, coherence, efficiency, effectiveness, EU added value.
* Digitalisation WG: call to discuss more holistically the A.I.S.E. Digitalisation and Ingredient strategy

Question from the MC were raised on the implementation deadline of the preservatives labelling. It was explained that A.I.S.E. asked COMM for this to be aligned to the timings for labelling of fragrance allergens, as this would mean companies could enact both amendments together. A reply to our request is expected.

* 1. Digitalisation Study *(V. Séjourné)*

Progress was shared with MC members regarding a meeting on 16 April with the Commission consultant (VVA/Conpolicy) in charge of running the study on hazard information simplification and use of e-labels. The key messages passed to the consultant were also shared: current label do not function, are not consumer relevant; opportunities exist to tackle duplication and inconsistencies; we see that some information should stay on pack; other can be moved online; digitalisation offers several benefits; we are committed to help this transition happen in a smart way for the benefit of consumers, etc.. They were also provided with all the BRES research as well as UN GHS activities. A follow up meeting will take place on 30 April to complete our input after consulting the members of the Digitalisation WG on 2 topics: our reco on what to keep on pack and what to move online; our main findings from the IT work that we have commissioned (to be assessed with the experts). Members were asked to let A.I.S.E. know in case they would be approached also by the consultant.

In addition, the study that commissioned to Atrify on IT tools was discussed. It deserves to be analysed by the relevant It/data management experts in the companies for assessing future scenarios. More will be shared in the coming week on that specific topic.

* 1. Air Quality: Updates to the PSP on Air Fresheners (G.Sebastio)

Following the webinar on the PSP on Air Fresheners, targeted at promoting this important initiative of A.I.S.E., some comments were made on the PSP for clarification by participants. There are two points that A.I.S.E. will raise:

1) Following the feedback received, A.I.S.E. had internal discussions with the experts of the Air Quality WG and will propose some minor updates and clarification to the PSP project description. These clarifications do not constitute any major change to the PSP but are amendments to make the requirements clearer and aim to increase the PSP’s outreach.

These are to:

* clarify that combustible air fresheners (aside from candles) are out of scope. i.e., the PSP only covers candles.
* clarify that products a company does not market are out of scope
* clarification of grouping
* clarification of timing

**The MC agreed to these amendments.**

***ACTION:
- A new project description for the PSP will be circulated (G. Sebastio).***

2) An additional point of feedback that A.I.S.E. has received on the PSP is that the lack of a logo or method of identification to products, makes the PSP less appealing. This point was discussed with the experts for the PSP on Air Fresheners who suggested that a stylized weblink could be created by A.I.S.E. Companies could then voluntarily add this weblink to their packaging; and the link would bring consumers to a webpage promoting the PSP. It is emphasised that as a voluntary component, this would not significantly change the PSP requirements. The PSP experts have connected with marketing on this point, and there were favourable opinions on this proposal.

A.I.S.E. asked for the approval of the MC to continue exploring the option of a voluntary weblink to be created to explain the PSP to consumers and promote this activity.

There was a lot of discussion on this point:

* It was seen as a good idea to explain the PSP to consumers, and it was emphasised that any weblink would need to look like a logo/ be visually attractive to a consumer.
* It was raised that companies want a way to promote their work to consumers.
* The point was raised that a coherent approach would need to be found with other A.I.S.E. Product Stewardship Programs (like the one of liquid capsules), as the LLDC PSP did not have any icons on-pack.
	+ As a counter point it was explained that the Air Fresheners PSP was different since the LLDC PSP had the yellow patch and there was ample communication on this, which the Air Fresheners PSP did not have.
	+ The MC agreed that coherence with the other A.I.S.E. initiatives would need to be considered.
* The point of pack space and adding an element to the on-pack was seen as a strategic decision to be brought to the Board.
* Air fresheners can have limits on on-pack space, sometimes not enough to include A.I.S.E. Safe Use Icons.
* Input from Communication was also seen as valuable

***ACTION:
- Prepare a proposal for the next MC (G. Sebastio).***

* 1. Activity & Sustainability Report 2020-21 *(V. Séjourné)*

The draft skeleton of the report has been circulated as part of the pre-reading. The Comms team is busy progressing this. V. Séjourné was keen to seek the attention of the MC members on the topic of had disinfectants as those were not (until now) subject to any specific mention. A proposal for a possible one pager on the topic had been suggested; this was discussed and in conclusion, it was agreed that: it would be worth having a special page drawing the attention of the reader to the key role of disinfectant, with a special spotlight on hand disinfectants. Some members though felt that there would be no value in trying to highlight the economic value/growth over the last year (vs former ones). Our messaging should focus on the PT1 products and avoid entering in sensitive areas. It would be important to tackle both household and PCH aspects of that category.

V. Séjourné called for a few volunteers to work on this and Francoise (Detic), Giorgia (Colgate) and Ad (Diversey) accepted to helped VS on this topic.

***ACTION:
- Ad hoc call to be set up to progress this.***

* 1. ERASM: Projects and Budget 2021- 2022 (G.Luijkx)

G. Luijkx provided an update of the different work streams currently undertaken by ERASM in both the Environment TC and the Human Health TC covering the work until end of 2021. He mentioned that quite a number of projects would be finalised by end of the year, such as e.g., eye irritation, Daphnia sensitivity & toxicity study, marine biodegradation, RSPO 2nd phase, etc. and good work had been achieved. As to the work programme for 2022 onwards, discussion is still on-going, also linked to the assessment and relevance of the CSS. For that reason, it was suggested that at the up-coming Board, only the 2021 situation of the projects should be shared. In principle agreement for the 2022 budget of 125K€ should be asked with the provision to share those after the May MC discussion at the Board in June.

***ACTIONS:***

***- Provide a summary to the April Board meeting the 2021 ERASM achievements and refer for the 2022 programme to the Board meeting in June after being discussed at the May MC (S.Zänker)***

***- Prepare for the MC in May an overview of the 2022 projects with a budget forecast (G. Luijkx)***

* 1. 1,4 dioxane

The Annex XV restriction dossier proposal for 1,4 - dioxane (deadline June 17th) was raised as important by members: <https://echa.europa.eu/fr/calls-for-comments-and-evidence/-/substance-rev/27604/term>

A.I.S.E. is also aligning with the surfactant industry on this topic, some questions that have been raised by CESIO were outlined.

* Are A.I.S.E./ Companies aware of the level of 1,4 dioxane in products?
* Is there a concentration limit for a restriction that A.I.S.E. members could accept? (e.g. 10 ppm as proposed by industry to the authorities in the US in 2019)
* What arguments can be collected quantifying the contribution of detergents to 1,4-dioxane release?
* What are the technical difficulties in the imposition of a restriction?

The MC clarified that EO surfactants are the major contributors for the detergent industry as 1,4-dioxane is present as an impurity due to by-products of the reactions.

In addition, it was raised that IKW had calculated the dioxane emission from EO surfactants from detergents was much lower than that measured by BAUA.

***It was agreed that A.I.S.E. would create a subgroup to contribute to the restriction dossier.***

***ACTION
- Send names of volunteers to*** giulia.sebastio@aise.eu (***Companies that are interested in participating to this subgroup)***

1. for information/ Questions only (12h30 – 13h00)
	1. Medical Device Guidance (G.Sebastio)

Refer to the pre-reading

* 1. Drain Cleaners (G.Sebastio)

Refer to the pre-reading

* 1. Enzymes (G.Sebastio)

Refer to the pre-reading

* 1. Skin sensitization (Biocides) (N.Hanon)

Refer to the pre-reading

* 1. Microplastics (M. Temsamani)

A.I.S.E. outlined its position on the proposed restriction in a call with Commission DG GROW and DG ENV on the morning of 20 April. The Commission had some critical questions on the use of encapsulated fragrance technology, and requested further information on products of the sector that would be subject to the obligations on instructions for use and disposal and annual reporting. A call of the Microplastics TF will be convened to develop a response. The Commission acknowledged the challenge of developing a draft restriction for this dossier by its nominal deadline of 23 May.

* 1. Single-use plastics for wet wipes (M. Temsamani)

Refer to the pre-reading

* 1. Green Dot scheme complaint (M. Temsamani)

Refer to the pre-reading

* 1. Debrief & feedback from 7 April launch of A.I.S.E./IFH report *(V. Séjourné)*

The attached presentation on the launch event (attended by 400 participants) and follow up meetings that are proposed by stakeholders (Commission DG Santé x 2, ECHA) was shared. This also included many activities by the A.I.S.E. network and VS thanks the NAC for doing so. Detic confirmed that this launch was an important milestone and asked to receive, if possible, the list of registered participants, so as to organise relevant follow up with their contacts.

* 1. Sleeves *(V. Séjourné)*

No specific comment; the material will be soon launched to industry for implementation.

1. EUROPEAN GREEN DEAL (13h45 – 15h30) *(S.Nissen, M.Temsamani, J.Robinson, L.Conti)*
	* 1. Chemicals Strategy for Sustainability

Heather Barker of Reckitt will represent A.I.S.E. in the first meeting of the High Level Round Table on 5 May. A draft A.I.S.E. position was presented and discussed; endorsement will be sought from the Board at its meeting on 29 April. An emphasis should be placed on constructive contribution by industry partners and a process to enable the transition to safe and sustainable chemicals. It was agreed/re-iterated that A.I.S.E.’s communications strategy should focus primarily on its own messages, but could accommodate joint industry activity where compatible.

* + 1. CSS Impact Assessment

The Management Committee was informed that the contract for this project was about to be signed, and that an introductory webinar (to be held if possible in conjunction with Cosmetics Europe and IFRA) was being planned to inform members about the process and the expectations from them as participants. A communication to National Associations is being prepared, asking them to encourage participation from their membership in order to meet the target of 70 companies. The MC confirmed its support to sign and launch the project.

Post-meeting note: 2 webinars will be organised, namely on 10 and 17 May.

* + 1. Circular Economy Action Plan (CEAP)

Activities with focus on green claims, consumer empowerment, Environmental Footprint method (PEF), and EU Institutions Outreach

S. Nissen provided an update of the status on workflows, which address so far three of ten priorities (see presentation, which includes the final version of the gap analysis as well). Those have been identified by the SSG as outcome of the PEF vs. Charter gap analysis. Indeed, work is progressing well on the 'Risk-based approach in the Charter (ESC vs. Usetox’ and the ‘Integration of PEF elements in the Charter ‘. Work on ways to empower consumers with robust and relevant product information’ will be initiated within shortly. In support of this ongoing work, the A.I.S.E. Board had agreed to a call for nominations to increase participation in the A.I.S.E. LCA expert panel (incl. CF expertise), and the Detergent Test Protocol TF (addressing the use phase and cleaning performance). The call for nominations was also extended to the Supporting Corporate Members SG.

Furthermore, S. Nissen referred to a meeting will be organised with the EF team of DG ENVI on 21 April. Main purpose of this meeting was the introduction of A.I.S.E.’s position and approach, i.e.:

* A.I.S.E. in support of CEAP objectives.
* Ensure coherent and legally sound legislative framework supported by a science-based approach and robust impact assessments.
* PEF not yet sufficiently mature and communication vehicles need to be developed and tested further.
* Charter as the centrepiece for our industry sector, integrating PEF elements in collaboration with EU COM.
	+ Use of risk assessment principles in chemical and product safety assessment.
	+ Empower the consumer with robust and relevant product information on environment so that the consumer is informed when purchasing a product.

The meeting was prepared in cooperation by the A.I.S.E. SSG, Advocacy SG and the Board sponsors for sustainability.

Following the publication in March of the A.I.S.E. Position Paper on CEAP, the paper was circulated among the EU Institutions. Furthermore, A.I.S.E. Secretariat started an outreach aimed at creating contacts with policymakers. The Secretariat provided an overview of the recent meetings held with representatives of the EP, COMM and Council, and shared the main findings and information gathered. The Institutional outreach will continue in the next months ahead of the policy and legal developments.

1. NEXT MEETING DATES

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| Tuesday 18 May 2021 | 10:30 – 15:30  | Webconference |
| Tuesday 29 June 2021 | 10:30-16:00 | Webconference |
| Tuesday 7 September 2021 | 10:30 – 16:00 | Brussels (A.I.S.E.)  |
| Tuesday 19 October 2021 | 10:30-16:00 | Webconference |
| Tuesday 23 November 2021 | 10:30 – 16:00 | Brussels (A.I.S.E.) |

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