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| MANAGEMENT COMMITTEE 07/2021 | |
| Minutes | Webex conference  Tuesday 7 September 2021 10:30-15:50 |

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| **Participants:**  *By phone:*  Giuseppe Abello, Assocasa (as from 11:00)  Ina Andreasen, RB  Walter Aulmann, Ecolab  Ian Croft, McBride  Giorgia De Berardinis, Colgate-Palmolive  Bernd Glassl, IKW  Ad Jespers, Diversey (Chairman)  Marten Kops, N.V.Z.  Gerard Luijkx, Unilever (Vice-Chair)  Joachim Noach, KoHB  Eleni Papadimitriou, PG  Rob Roggeband, P&G  Felix Rustemeyer, Henkel  Françoise van Tiggelen, Detic  Edward Whittle, SC Johnson  Guests for topic 4.3  Diederik Schowanek, P&G  Arndt Scheidgen, Henkel |  | *From A.I.S.E., (for their respective agenda topics):*  Cindy Chhuon  Majlinda Cobaj  Lina Dunauskiene  Zivile Kairyte  Sascha Nissen  Jan Robinson  Giulia Sebastio  Valérie Séjourné  Amelie Weber  Susanne Zänker  Apologies  Thomas Rauch, I.H.O.  Pilar Espina, Adelma |

1. **WELCOME AND REMINDER OF COMPETITION LAW**

The Chair of the MC, Ad Jespers, opened the meeting and welcomed the participants.   
The Competition Law rules were reminded, and all participants agreed to adhere.

1. **APPROVAL OF MINUTES & REVIEW OF ACTIONS OF LAST MEETING (29 June 2021)**

The actions from the last meeting were reviewed, they are either undertaken or covered through the agenda. The Minutes were approved.

1. **Approval of the agenda**

The agenda (revised version sent out with annotated agenda on 1 September 2021) was approved.

1. **KEY TOPICS *(for discussion)*** 
   1. **Reflections on the future** *(S.Zänker)*

Driven by the external political developments and the internal changes within A.I.S.E., it was proposed to review the A.I.S.E. strategy and functioning (“Are we fit for the future?”). We had set our A.I.S.E. Strategy 2025 in 2016 it is now time to review it, define our needs, formulate our calls, foster our political outreach, and adapt the Strategy to remain proactive and to ensure the competitiveness in a sustainable way for the future of our industry sector.

Shortly before summer interviews were conducted with some Board members (12) asking them to define their needs to operate in the transition towards the Green Deal, their view about challenges/ obstacles to be addressed, areas of opportunities, etc. The replies were compiled into a draft thought-starter.   
The Board discussed this first draft of the thought starter early September and supported the adaptation of the strategy taking into account the external and internal situation, and also the broad directions set in the draft. ([see slides](https://aise.wall.idloom.com/#/filelastversion/12779) including the Board comments)

The MC appreciated the time taken to adjust the strategy 2025 and made the following comments:

- Content (*What*): identify with the help of the different working groups the key areas to focus on; articulate the needs/ requests in a concrete way for a successful contribution to achieving the Green Deal objectives of the Commission;

- Advocacy process (*How*): It was suggested to sharpen the process by identifying the windows of influence (best timing and best targets), i.e., reactive versus proactive and the relevant level (Commission, Member States, EP etc.) The role of the NAC should be more clearly emphasised as the influence from member states authorities is increasing, providing an opportunity to reach out at an early stage at that level via the NAC.

* 1. **Hand sanitiser compliance - cross industry opportunity** *(E.Whittl*e*)*

E. Whittle shared his company’s leaflet on hand sanitisers being used to explain to stakeholders via an infographic what an “hand sanitiser” is and the legal requirements that are applying to be compliant. The objective is to increase the understanding of consumers and users about the process that is behind the placing of a product on the market, the potential danger of using non-compliant products and to help authorities as well in their communication about non-compliant products. Recent RAPEX recalls triggered this initiative to be developed.

The MC discussed whether A.I.S.E. should take up this project. The idea and the sharing of the leaflet were appreciated. However, due to the still existing differences in each country on requirements to put products on the market, it was not felt relevant for A.I.S.E. to develop a standardised mock-up. It was suggested to share the leaflet with the NAC at their next meeting, and to propose its locally adapted use, if interested.

* 1. **Polymer degradability: proposal for research collaboration** *(D. SchowanekJ.Robinson)*

D. Schowanek and A. Scheidgen presented an overview of the proposal for a research collaboration on improving degradability criteria methods for polymers that would not fulfil the current criteria for ready or inherent biodegradability, yet are not genuinely “persistent” ([see slides](https://aise.wall.idloom.com/#/filelastversion/12781)).  
A timeframe of 3-5 years is envisaged for this research, to encompass the development/adaptation of relevant methodologies plus the process of endorsement at OECD. MC members queried why such work would not fit better in Cefic or ECETOC; this had in fact been proposed to Cefic as an LRI project but was not taken up and their programme is now fixed for the next couple of years. Furthermore, research collaboration specific to A.I.S.E. and its partners (such as CosmeticsEurope/IFRA) can be more focused on polymers that are relevant to these sectors.

A “light” approach to enable sharing without significant resource investment was suggested, rather than a formal structure such as that of ERASM, however it was pointed out that a stable secretariat and legal governance structure are required in order to (e.g.) be able to establish contracts with laboratories. It was agreed to have a further discussion outside the MC between the companies already involved and the A.I.S.E. Secretariat, to develop a more elaborated proposal for presentation to the next meeting of the MC.

***Action:  
- Secretariat to organise call with relevant members***

* 1. **Revision of the General Product Safety Directive** *(L.Conti/G.Sebastio)*

The MC was updated on the revision of the GPSD. A request was made to A.I.S.E. to assess the relevance of the changes.

Based on an initial reading the legislative proposal covers some points of interest to A.I.S.E. members. However, due to an exemption in Article 2(1) for products covered by CLP/ REACH/ Det Reg/ BPR various criteria do not apply. However, there are sub-points in the GPSD that could be of interest to A.I.S.E. working groups, not for specific action, but rather to inform on the way the regulatory framework will develop to cover other issues that have been raised in the past (e.g., lack of compliance for online sales). A mapping of the areas raised under the GPSD and possibly interested groups in A.I.S.E. was shared.

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| Topic | Explanation of Possible relevance | Interested group |
| Market surveillance of harmonised products   * Safety gate rapid alert system | Provides a response to industry calls for better enforcement | **CSS WG/ HLRT** |
| Recall notice and right to remedy | Possible impact for cleaning products? | **? (Interesting for All)** |
| Extension of ‘safe product’ definition to risks ‘occurring from reasonably foreseeable misuse’ |  | **? (Interesting for All)** |
| Digital services act   * Obligations for online markeplaces | Of interest for the topic of online sales.  Includes Safety and cybersecurity online (can be relevant for websites of companies) | **CLP WG, Digitalisation WG, Detergent WG, PC&H SG** |
| Safety requirements for chemical risks in products not covered by their own Union harmonised regulations | Places most of our products and chemicals risks our of scope – possible open question for candles, and for microbial products | **Air Quality WG, Detergent WG, PC&H SG** |
| Inclusion of food-imitating products directive into the new GPSD |  | **LLDC SG** |
| New requirements for traceability and transparency   * Obligation of economic operators in case of distance sales/ accidents or safety issues | Possible impact on Refill products | **Detergent WG/ CLP SG** |
| Regular monitoring of the status of the file in the EP and Council and report to the relevant A.I.S.E. WGs / TFs accordingly | In case relevant developments for our sector occur during co-decision | **Advocacy SG** |

The following questions were raised to the MC with responses:

1. ***Assess the importance for the sector of GPSD considering the exemption on requirements for products covered by their own harmonized legislation.***

This is considered an important legislation for our sector, although Detergents can be out of scope of various requirements. The concerns were:

* Some products like fabric softeners may not be covered by other horizontal legislation to the same extent and thus are under GPSD.
* That regulators could go beyond the current requirements
* The extension of ‘safe product’ definition to risks ‘occurring from reasonably foreseeable misuse’. This concern in particular was considered key. There is some overlap regarding how the REACH assessment is done (already covers consumers overdosing etc.), however the wording of “foreseeable misuse” was seen as very problematic, since it could encompass all kinds of actions from end users.
* The issue of products that can be perceived as “food imitating”: this is relevant for capsules. However, there have been other examples like transparent products sold in transparent plastic bottles that look like water.

1. ***A.I.S.E. suggests informing relevant groups on the chapters of the GPSD that are of relevance. Does the MC agree with this proposal? Should further actions be taken? Engagement with other industry sectors?***

The mapping done by A.I.S.E. and suggestion to inform various groups on GPSD developments was seen as a reasonable way forward. However, the MC also requested additional actions:

* A.I.S.E. asked to align with Cosmetics Europe and assess if a contribution could be made to the statements of CE. Possible alignment also with other DUCC sectors.

1. ***If further action should be taken, who should coordinate this action – e.g., CSS WG/ Management Committee directly?***

The MC agreed that this topic will be coordinated directly by the Management Committee.

* 1. **Update on CLEAN & NordQual projects by consumer NGOs** *(V. Séjourné)*

Developments that have occurred recently in some countries with the 2 coalitions of consumer NGOS were summarised in the attached overview. V. Séjourné also indicated the possible follow up actions that A.I.S.E. is considering, ranging from further Charter promotion to NGOs, improvement of Charter comm in the relevant A.I.S.E. websites, a potential code of practice on claims (not yet confirmed), improvement of access to online information (for Det Reg requirements), and digitalisation agenda.

* 1. **Detergent Regulation** *(G. Sebastio)*

An update was given to MC regarding the results of the first of two joint calls of the Detergent WG and Advocacy SG.The objective of the call was to rediscuss the A.I.S.E. strategy for the Detergent Regulation through the joint expertise of the Detergent WG and Advocacy SG, to revamp the A.I.S.E. position in time for:

1. The October Commission WG on the Detergent Regulation,
2. November/Dec 2021: when it is expected the consultation for the Commission study on the Detergent Regulation to take place
3. the planned A.I.S.E. activity with MEPs in November.

***Post-meeting note:*** the Commission WG is now postponed to December.  
Some important actions were agreed by the two groups and a second update will be given to the Management Committee following the September 27th call. One specific action was highlighted to the MC.

The [CLEAN](https://www.euroconsumers.org/activities/clean-project-how-to-know-how-clean-a-detergent-actually-is) and [NordQual](https://www.sverigeskonsumenter.se/media/ftdlxtut/report-nordqual_9augusti2021.pdf) projects raised concerns that not all companies were listing the ingredient information of the product online. This conclusion and message is highly problematic in terms of the A.I.S.E. digitalisation strategy. It was agreed to expand the guidance on consumer-friendly publication of ingredients online to include a new chapter, for example with a check list, of what companies should consider in their internal process to ensure the ingredient list is being published and consumers can find the information. E.g., on recommendations for how to name products online (the difference between brand name and brand claims).

Volunteers have been requested from the Detergent WG and Digitalisation WG to discuss the Guidance update. **A.I.S.E. raises this to the MC, as it is crucial for the recommendations to be implemented, and members to carry out internal checks to ensure all ingredient listings are published online.**

A few comments made:

* The digitalisation of information has brought some difficulties, and this is acknowledged. However, there is also an argument to be made that it shows that updates to the Detergent Regulation are necessary. The requirement to use a website is outdated as there are better technologies to facilitate consumers to finding the ingredient datasheet. E.g., as is done with Smartlabel. No passwords.
* The discussion that is taking place in the joint Detergent WG/Advocacy SG is interesting: a call was made to ensure the NAC is prepared with the key topics before the Commission Detergent WG call in October.
  1. **Digitalisation: A.I.S.E. consumer pilot research for hazard and sustainability info & input to Commission study – Latest developments** *(V.Séjourné/G. Sebastio)*

Progress done in summer on the topic was shared (cf [PPT presentation](https://aise.wall.idloom.com/#/filelastversion/12785) and online demo). This includes our input to the Commission consultation on the Inception Impact Assessment (due till 20 September), the development of 2 alternative labels and an online demo to present the info, which will be subject to consumer research (quali and quanti) in Sept- Oct 21. These developments were appreciated, and we all look forward to seeing the results of the consumer research in the next weeks.

1. **for information/ Questions only**

Refer to [annotated agenda](https://aise.wall.idloom.com/#/filelastversion/12761)

* 1. **Ethanol harmonised classification proposal** *(J.Robinson)*
  2. **Update on ERASM activities** *(J.Robinson)*
  3. **PSP capsules- Updates of PSP text & accident report** *(V. Séjourné/J.Robinson)*
  4. **SPERCs**  *(G. Sebastio)*

5.5. **Air quality** *(G. Sebastio)*

5.6. **Charter Symposium 2nd edition 2021 on 8 December** *(S.Nissen/A.Weber)*

5.7. **Alleged Dual Quality for detergents products** *(L.Conti)*

5.8 **European Parliament Political Outreach**  *(L.Conti)*

5.9 **Hygiene Communication- Follow up strategy** *(V. Séjourné)*

No specific comment.

5.10 **UFI communication campaign by/with ECHA** *(V.Séjourné)*

No specific comment.

5.11 **Climate Communication to end users** *(V.Séjourné)*

No specific comment.

5.12 **EPAA Annual Conference** October 27, 2021 [virtual, 2-5pm] (*R.Roggeband)*

Download link [HERE](https://ec.europa.eu/docsroom/documents/46611)

***LUNCH BREAK 13:00 – 14:00***

1. **Green Deal (14:00 – 15:30)**
   1. **Circular Economy Action Plan (CEAP)** 
      1. Update on recent activities *(S.Nissen)*

The SSG CEAP team and the dedicated sub-groups continued to progress on several workstreams which had been identified as priorities via a gap analysis. S. Nissen provided an update on the activities as follows (see also the slides, which were presented on the topic):

* Technical proposal on the potential integration of EF policy in the Charter: this had been submitted to DG ENVI and DG GROW in early summer. Despite several efforts from the A.I.S.E. team to follow-up with COM during July and August, no feedback has been received so far. The A.I.S.E. team will continue, aiming for a meeting in early autumn.
* Product Cleaning Performance Market Mapping: following the Board approval in July, a briefing was issued to four test institutes, leading to a decision to mandate WfK. The contract is currently being prepared by the legal team, so work can start within shortly.
* Integration of carbon footprinting into the Charter product scheme (for the related pilot on the sustainability information, refer to agenda item 4.6. Digitalisation): the A.I.S.E. LCA Expert Panel has started to investigate on the technical specificities, building on the EF method for measuring the impact on climate change potential and the IT tool which had been developed during the A.I.S.E. PEF pilot for laundry detergents.
* USEtox method and ‘Characterisation factors’ (CFs – factors being used for the calculation of EF toxicity impacts): the LCA consultancy RDC has been mandated to calculate results with new JRC-amended USEtox CFs and to show results in comparison with the old results of our PEF pilot. Aim of this exercise is to explain if / how the new CFs are a meaningful improvement or continue to show limitations (within the context of PEF, i.e., for comparison of products). Results are expected for early autumn. Members of the MC expressed interest in creating (industry) alliances on this topic.
  + 1. PC&H sector and Green Deal *(L.Dunauskiene/A.Weber)*

During its June meeting, the National Associations Committee agreed that outreach at EU level (Commission, EP, etc.) should go hand in hand with outreach at MS level. In this context, NAs were asked what kind of tools and guidance they need from A.I.S.E. to convey key messages. It seems that local authorities refer often to schemes like the EU Ecolabel, though the Charter is much more successful than the EU Ecolabel. NAC members raised the point that it would help if the Charter got stronger in the PC&H sector; here, the initiation of the new PC&H Green Deal sub-group may be helpful as a next step forward. The kick-off of the new PC&H sub-group, including Terms of Reference, is under preparation. For this, a preparatory brainstorming session was held with NAs to identify the needs and expectations of the sector. During the session, it was suggested to highlight the urgency in communicating to legislators as well as to identify potential threats the professional sector may face as a result of upcoming legislative proposals. The NAs suggested to work on topics with specificities for the professional sector, where the legislation is going to change significantly in the short-term, and that are not yet taken up by A.I.S.E. specifically for the professional sector. In this context, packaging, GPP, the EU Ecolabel and biobased materials were identified as relevant topics, and the idea was raised to start with the work on packaging, and to identify the priority areas for the other topics once further details are available from COM. As the sub-group will be reporting to the PC&H SG and the SSG, the topic will be brought forward to the next meetings of the two SGs. As a next step, it will thus be discussed in detail during the PC&H SG meeting on 22 September. In the MC discussion, it was clarified that the work of the sub-group will focus on the Circular Economy Action Plan, and the importance of the EU Ecolabel for the professional sector was highlighted.

* 1. **Chemicals Strategy for Sustainability**
     1. Public Consultation CLP (*C.Chhuon)*

Following the launch of the Chemicals Strategy for Sustainability in October 2020, the CLP revision roadmap was published in May 2021 to which A.I.S.E. could provide [input](https://aise.wall.idloom.com/Post/Preview?ID=12275).  
The Commission aims for reaching a draft revision by the end of 2021 and to do so, the 14 week-public consultation on CLP revision opened on 9 August. The questionnaire comprises two sections: general questions and a section targeting CLP experts. A first draft response has been elaborated with volunteers of the CLP WG and more input will be gathered at the next WG meeting on 28 September. The INCPA members are invited to contribute to the consultation as well, with particular focus on the risk of increased deviation from the global harmonisation principles under GHS (UN GHS).

Additional opportunities for discussion with the Commission will be provided through targeted consultations throughout this fall on the following topics: PMTvPvM / PBTvPvB, on-line sales, harmonised PNEC/DNEL/DMEL, labelling, 18th ATP to CLP and Scope of CLP, CLP Inventory.

Endocrine Disruptors will also be part of the agenda this fall with several dedicated events.  
The 5th Caracal subgroup meeting on EDs (13 September) will deal with the inclusion of criteria for EDs in CLP. The agenda focuses on the wordings and details of category 2 (suspected EDs), and on hazard communication. Another event for EDs is the 3rd annual Forum on EDs which will take place on 21,22 September.

* 1. **SSbD Horizon Europe project** *(J.Robinson)*

Refer to [annotated agenda](https://aise.wall.idloom.com/#/filelastversion/12761). No further comments or questions raised.

6.4 **In-depth review (‘deep-dive’) of potential strategic dependencies for chemicals** *(L.Conti)*

No further comments.

1. **NEXT MEETING DATES**

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| Tuesday 19 October 2021 | 10:30 - 15:30 | Webconference tbc |
| Tuesday 23 November 2021 | 10:30 – 16:00 | Brussels (A.I.S.E.) |

Document name: 2021-09-07 MC Minutes A.I.S.E., 21 September 2021