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| national associations commiTtee meeting 03/2021 | |
| Minutes | Web conference  Thursday 16 September 2021 10:00-14:30 CEST |

*GuestS: Nadia Viva (point 3) & ArndT Scheidgen, Sadhna Sahani, Lisa SLIGTING (point 5.1)*

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| ***Participants:***  *By phone*  Mr Giuseppe ABELLO, Assocasa  Mr Petr BOBROVSKIY, APCoHM  Mr Bernard CLOETTA, SKW  Ms Ana-Maria COURAS, A.I.S.D.P.L.  Ms Virginie d’ENFERT, Afise  Ms Pilar ESPINA, Adelma  Ms Helle FABIANSEN, KoHB  Mr Christian GRUNDLING, FCIO  Mr Olof HOLMER, K.T.F.  Ms Inara JONISKIENE, Likochema  Ms Sari KARJOMAA, KH  Mr Thomas KEISER, I.K.W.  Mr Philip MALPASS, U.K.C.P.I.  Ms Anna MELVAS, K.T.F.  Mr Hallar MEYBAUM, EKTL  Mr Istvan MURANY, Kozmos  Ms Anna OBORSKA, P.A.C.D.I.  Ms Tulin OZKOCA, KTSD  Ms Jelena PEJCINOVIC, Kozmodet  Ms Mihaela RABU, Rucodem  Mr Finn RASMUSSEN, V.L.F.  Mr Thomas RAUCH, I.H.O.  Mr Hans RAZENBERG, N.V.Z.  Ms Marijana SABLIJC, HGK  Mr Roman STERBAK, S.Z.Z.V.  Ms Françoise VAN TIGGELEN, Detic | ***From A.I.S.E.:***  *By phone*  Ms Cindy CHHUON  Ms Majlinda COBAJ  Mr Luca CONTI  Ms Elodie CAZELLE  Lian DUNAUSKIENE  Ms Zivile KAIRYTE  Mr Sascha NISSEN  Ms Jan ROBINSON (partly)  Ms Valérie SEJOURNE  Ms Giulia SEBASTIO  Ms Amelie WEBER  *Apologies*  Mr Lukas HORAK, CSZV  Ms Susanne ZÄNKER  Ms Aisling O’KANE |

1. REMinder on competition policy

The rules of the Competition law were reminded, and all agreed to adhere.

1. Welcome and approval of agenda

The Chair, Sari Karjomaa opened the meeting by welcoming the attendees to the web-conference. She apologised Susanne Zänker who could not attend the meeting due to family reasons. She also welcomed, on behalf of the NAC, Nadia Viva, the A.I.S.E. president who will attend the first part of this meeting, and Majlinda Cobaj as new intern at joining the A.I.S.E. Team. The agenda was approved as sent out.

1. TOUR DE TABLE AND EMERGING ISSUES AT NATIONAL LEVELS with President Nadia VIVA
   1. **Some words from the President** (N.Viva)

Nadia Viva shared a presentation on the priorities of A.I.S.E. and the key role of the National Associations to help achieve this strategy, due to their critical role to influence Member States at Council level and Members of the European Parliament. She also indicated her wish – once the safety measures will allow it – to visit several National Associations.

Her visionary speech and participation at the NAC were well appreciated by NAC members.

* 1. **Tour de Table**
* **From Belgium (Françoise):**

Like in other countries, the European Green Deal triggers the National political agenda.

Beside the Energy & Climate discussion (which does not concern directly the Detergents and Maintenance sector), circular economy is very much in the focus.  Each Region is working on its own plan, combining the shift to circular economy with the need to stimulate the economic recovery, after the recess following the covid pandemic.  
For DETIC sectors, this is very much linked to our historical activities regarding packaging.

DETIC will sign very soon a Green Deal\* with the Flemish authorities entitled “Differently Packed”.  The purpose is to encourage companies to engage in implementing development projects which will either reduce the use of packaging or replace one way packaging with reusable packaging.  The Green Deal is also involving the Food & Beverage industry and the Retailers.  There is a budget foreseen

* for making studies (for instance, to evaluate the acceptability by consumers),
* for coordinating the promotion and support to volunteer companies as well as
* for individual company projects.

To be noted: the budget used for this projects comes actually from the fund filled by the industry in the frame of the packaging EPR scheme…   
\*the Flemish authorities started working on such partnership initiatives more than 5 years and signed their first GD related to Mobility in 2017.

* **From Denmark (Helle):**

- The Danish government is working on a new chemical action plan to succeed the one that ends by the end of 2021. It will run for four years and will include topics on biocides, consumer information, allergy, innovation and research. We are actively participating in the process and have delivered our key messages in statements, articles in media. In addition we have been invited to present our views on biocides at a political workshop 10th September. The chemical action plan will be negotiated in the Danish parliament in the autumn.

- As part of our hygiene project for the professional market we asked HBS Economics to conduct an analysis of the socio-economic benefits of hygiene. The study has led to some very interesting findings and these will be pitched to leading national media, decision makers and presented at a conference in October.

* **France (Virginie):**

***- Toxiscore :*** multi stakeholders working group should start in January. The topic appears in several political parties’ programs (from left wing to right) for the presidential election (April 2022)

- ***Environmental information and scoring*** : pression from government is strengthening on federations to organize sectorial experimentations following the publication of loi AGEC (circular economy law) and loi Climat

- Several ***decrees*** coming from loi AGEC will need monitoring at Commission level : obligation of packaging re use, ban of allegations such as biodegradable, obligation of information on environmental and product characteristics (recyclable, content of recycled material, presence of SVHC and ED…)

- Following and monitoring of ***presidential campaign on chemical related topics*** : need to send sectorial position, meeting with candidates’ teams, responses to attack.

* **From Finland (Sari):**

***- National program on chemicals***Ministry of the Environment is leading the preparation of a new national chemicals program for Finland. It will be finalised by the end of the year and will pave the way for years 2021-2035. The program will reflect developments at the UN (SAICM) and the EU level, including the Green Deal, and will be supported by the national Plastics Roadmap and the national Strategic programme to promote a circular economy.

The draft program focuses on five areas:   
1) human and environmental safety,   
2) circular economy and sustainable chemistry,   
3) fact-based decision-making,   
4) international cooperation for chemicals safety and   
5) communication and interaction among professionals involved in the chemicals sector.

The Finnish Cosmetic and Hygiene Industry Association together with e.g., Chemical Industry Federation and Finnish Commerce are actively participating in the process. We have been advocating for example for the fact-based decision-making as well as for cooperation and interaction, which seem to be included in the program.

* **From Germany (Thomas):**

***- Green Deal / CSS in Germany***

September national elections might bring a new green/left coalition with an even higher focus on green projects. Currently the Federal Environment Ministry is in favour of many tightening, the Ministry of Labour is slowing down a bit.

However, the Federal Institute for Risk Assessment (BfR) has expressed itself very clearly and critically on the chemicals strategy within the framework of the Green Deal. BfR (co-author is also the BfR President), who massively criticises the hazard-dominated approach of the CSS as well as the hasty and overambitious approach:

‘…it runs the risk of merely amplifying arbitrary concerns instead of following an evidence-based approach to focus the overall limited resources on pressing issues that matter […]’

‘…Thanks to the existing system of chemicals regulation in the EU, the current level of protection of its population as a whole, including sensitive sub-populations, against chemical risk is among the highest in the world. *The rather bleak picture connoted in the CSS and its associated Staff working Document thus appears misplaced*. As a prerequisite for improving public health protection, where necessary, risk assessment methodologies and processes are in constant need of adaption to scientifc progress. Nevertheless, a modern and enlightened society should base its decisions on the best scientific knowledge available.’

‘…For this reason, the scientific discussion process cannot work on the basis of claims alone; instead, convincing evidence is needed for this purpose. Promoting unjustified beliefs and anxieties for the sake of appeasing public concern in the end bears a substantial risk of amplifying this concern. Without adequately secured expert advice*, it will also lead to illinformed decision-making and ultimately foster the erosion of the authorities’ scientifc credibility*.’

IKW together with the chemical industry association will support the BfR statement in further advocacy actions.

* **From Hungary (Istvan):**

The introduction of EPR scheme;

It seems that the introduction of EPR scheme is not going to be easy in some countries – also including Hungary. Therefore, it’s proposed to discuss this topic, not in technical details, only to see what countries might be effected badly and find out an easy way working together within the framework of AISE. This issue used to be more up to the local governments, but with the EU circular economy package, as it has probably a more European angle than before.   
KOZMOS would like to participate in such an activity to see and learn from the perspective of other countries.

* **From Italy (Giuseppe):** one of the topics of greatest interest is still that relating to plastics.

In particular, the Association is carrying out many activities in relation to: labelling of packaging, plastic tax, implementation of the SUP Directive.

- ***Plastic TAX***

The Plastic Tax should have been implemented starting from 1 July 2020. Through intense advocacy actions carried out together with many industry sectors, the tax was postponed to 1 January 2022.

The whole industry sector is still against the introduction of the tax and at the national level the industry has asked for the establishment of a National Table on plastics also due to the introduction of the European Plastic Levy.

Considering the practical difficulty to implement the tax and the relative lack of implementation decrees, the plastic tax is now approached from a different perspective and therefore is possible to believe to redefine it.

At this moment, therefore, all the questions and application problems that have been raised by companies do not have an answer.

***- Environmental labeling of packaging***

Implementation of Directive (EU) 2018/851 amending Directive 2008/98 / EC on waste and implementation of Directive (EU) 2018/852 amending Directive 1994/62 / EC on packaging and packaging waste set new environmental provisions: all packaging must be appropriately labelled according to the procedures established by the applicable technical standards and in compliance with the determinations adopted by the European Commission, to facilitate the collection, reuse, recovery and recycling of packaging, as well as to provide a correct information to consumers on the final destinations of packaging. Producers are also obliged to indicate, for the purposes of identification and classification of the packaging, the nature of the packaging materials used, on the basis of Commission Decision 97/129 / EC .

The law should have entered into force on 26 September 2020 but through numerous advocacy activities carried out in coordination with all the industrial sectors involved, it was possible to postpone the entry into force to 1 January 2022.

Given the application difficulties and in particular the problems related to exports / imports, following the requests of the industry, many facilitations have been introduced including the possibility of using digital labelling and the possibility of disposing of stocks of products manufactured and sold before 31st December 2021. This period of stock disposal is also applied to packaging and not only to final products.

* **From the Netherlands (Hans)**

***- Extension of exemptions for disinfectants***  
The various exemptions for disinfectants currently applicable for The Netherlands have been extended. The exemptions for hand and surface disinfectants are extended until February 28, 2022. For aircraft disinfectants, the exemption is are applicable until February 8, 2022. The content of the exemptions remain unchanged.

***- NVZ and the Chemicals Strategy for Sustainability***   
The Netherlands is often a vocal and active part of the discussions surrounding the Green Deal, in particular the Chemicals Strategy for Sustainability (CSS). In several dossiers NL is even leading, including the topic of the Mixture Assessment Factor (MAF) and the restriction on PFAS. NVZ has therefore decided to take a very active role in our advocacy regarding the CSS.  
In the form of Mengend Nederland (a Dutch DUCC-like collaboration with the associations for paints, adhesives, aerosols and cosmetics) we are in direct contact with the NL Member State representatives. We've had preliminary meetings on the topic of CSS and have agreed to keep in contact as the CSS progresses. NVZ is also actively involved in the CSS discussions with the Dutch Cefic and Business Europe counterparts, VNCI and VNO-NCW.   
On the 9th of December Mengend Nederland is hosting an informative event for members on the topic of CSS, in particular the Dutch developments. Speakers include Dutch Member State representatives and experts from RIVM.

***- Hygiene Forum 2021***  
On 4 October 2021, NVZ will organise a new edition of the Hygiene Forum. This year we've chosen to focus on a Dutch target audience within the field of professional cleaning & hygiene. We've decided to enter into a partnership for this event with two other parties: the Dutch cleaning company association Schoonmakend Nederland and the association for cleaning research.  
The theme of the event is: improve hygiene for a healthy future! The programme includes plenary presentations on the hygiene hypothesis and on the importance of ventilation. Participants can chose from a variety of workshops to follow in two workshop rounds.

The main goal of the Hygiene Forum is to emphasise the importance of cleanliness and hygiene in the continuity of our society. The main target audience for the day are persons responsible for cleaning and policy makers. Our international colleagues are welcome to join, but please note that the majority of the programme will be held in Dutch.

***- Virgins Plastics Tax***  
As of from 1st of April 2022 a proposed UK plastic packaging tax will take effect. The tax will apply to plastic packaging manufactured in, or imported into, the UK where the plastic used in its manufacture is less than 30% recycled plastic by weight.   
In the Netherlands there are also discussions about increasing the current EPR-fee for virgin plastic compared to recycled plastic. NVZ is in discussion with the Dutch Packaging Waste Fund about this topic. To see which direction this will go, it would be helpful to know how the discussion is developing in other member states.

***Ethanol in NL under pressure***  
As many of you will be aware, ethanol is considered a CMR substance from the perspective of the Dutch Occupational Health and Safety legislation. In practice this means that employers need to take additional occupational health measures when employees are working with ethanol containing products (from 0.1%).

The Dutch OHS inspectorate is of the opinion that the position of ethanol in NL would have to a lead to a CMR cat. 1 classification of ethanol under CLP as well, based on the principles of self-classification. NVZ is actively arguing against this national position and interpretation of EU legislation. Moreover, such discussions would need to be discussed at EU level to ensure a level playing field. The recent developments on the harmonized classification of ethanol show that a pragmatic approach is necessary for this substance.

* **From Norway (Finn)**

***- Measures drain openers September 2021***

VLF's members commit to the following measures to reduce accidents and adverse events with drain openers:

1. Development of a new symbol that is clearly prominent about the danger of the products. The mark should be placed easily visible and preferably near the cork. The following symbol is selected:

Logo

Description automatically generated

The subtitle is voluntary to place on the products but is recommended in other materials such as shelf markers.

The symbol must be sufficiently visible and equal to or larger than the size required for the hazard symbols in the CLP regulations. It is desired that the colors be kept as blue and white, but the blue color is flexible, and no specific pantone color has been set.

2. Shelf markers are being developed that the outlets can place on the shelves with the mark and text for increased visibility at the time of purchase.

3. VLF recommends that all manufacturers, including the trade's own brands, follow this recommendation. The material that has been developed can be used freely by all suppliers/ manufacturers.

4. VLF and its members will disseminate and promote the Norwegian Environment Agency's video which has been posted on the directorate's Facebook pages about the dangers of drain openers.

* **From Poland (Anna)**

- ***EPR:***

Proposal of PL act implementing Extended Producer Responsibility  is now being consulted and discussed in Poland (consultation extended till 20 September – we were successfully postulated this extension)

- the draft of the Polish act does not introduce any improvements in the packaging waste management system

- may strengthen the deficiencies of the current system and imposes an enormous burden on industry, while failing to protect the environment and contradicting the provisions of the directive it implements

- meeting it’s financial obligations will be a huge challenge for entrepreneurs (approximately an 40-fold increase in cost), especially SME sector companies.

- In our opinion work on EPR solutions in the form presented should be discontinued, we postulated to rewrite the proposed act – we introduced the position to the Ministry of Climate and Environment (and prepared the common position with Union of Entrepreneurs and Employers and National Chamber of Commerce to have a bigger coalition).

- We meet with the Deputy Minister Mrs. Olga Semeniuk introducing the industry position. We received from  Minister Olga Semeniuk an assurance of a full support of Ministry of Development and Technology for our postulates - it is an important step towards influencing the Ministry of Climate and Environment to hear  our voice and take into account the comments coming from the producers.  
In the current proposal we got an exemption of household detergents from the definition of hazardous substances – which we strongly postulated. Now we are trying to broaden this exemption also for biocides.

***- BIOCIDES:***

The Act on Biocidal Products is being currently amended. It contains many positive changes and simplifications for the biocidal industry, including proposed by the Association the amendment of the unfavorable provision in the act on authorisation 3 years after the approval of last active substance in a biocide (discussed during the NAC meeting – March 2021). It seems that we managed to solve this problem locally (the problem resulting from the Art. 89 (3) of BPR provisions was related to the inability to make amendments to the national authorisation (e.g.,. to update classification), when the company does not receive European authorisation within 3 years).

***- The Act on Biocidal Products (now):***

Art. 36

The authorization, for which all active substances have been approved, shall expire:

1) if an application for an authorization has not been submitted or an application for an authorization has been submitted without meeting the legal deadline for its submission - after 180 days from the date of approval of the last active substance;

2) where an application for an authorization has been submitted not later than by the approval of the last active substance: a) on the day of issuing the permit,

b) after 180 days from the date of issuing a decision other than issuing a permit,

***c) 3 years after the approval of the last active substance in the biocidal product, if the application is not considered within this time***

*-* whichever occurs first.  
**In the project of Amendment of the Act on Biocidal Products the point c) (in red) has been deleted – which we very strongly postulated.**

* **From Portugal (Ana)**

Portugal is similar with the situation described by Pilar in Spain. The difference is that we are dealing with published legislation - waste and packaging - with early implementation dates and we envisaging more legislation and obligations until the end of the year.

* **From Romania (Manuela)**

- ***Detergents:*** participation to the interview with the consultant on Detergents Regulation revision;  
- ***Biocides:*** delays for the authorities to issue the mutual recognitions certificates; not clear if the the number of the MR certificate should be or not mentioned on the label;  
- ***UCPD transposition - provision on product differentiation:*** level of sanctions are extremly high, not clear who is responsible to provide info on products in case of differentiation;

* **From Russia (Petr)**

- about ***Green Deal:***   
No special "Green Deal" program as it is in EU. But there is a national state project "Ecology", which includes amendments in waste management sphere and extended producer responsibility (EPR).  
Ministry of the natural resources and ecology suggested to implement the responsibility for 100% of packaging of all consumer goods since 2022. If a company can't utilize 100% of packaging it should pay ecological fee to the federal budget.  
More than 30 business associations (including APCoHM) signed a letter to the Government with the request to decline this initiative. The reasons are lack of separate waste collection infrastructure, lack of the recycling plants and impossible rate of packaging utilization. Ministry of Industry and Trade and Ministry of agriculture support the request. Ministry of economic development send the negative response for the initiative of Ministry of natural resources and ecology.  
Due to those efforts there are a big chance to revise the initiative and to make appropriate amendments according to business community request.

APCoHM received the right to lead secretariat of Interstate Technical Committee for standardization "Household chemicals" (detergents and homecare). This committee is responsible for GOST standards - GOST is used by CIS countries (ex-USSR republics, excluding Estonia, Latvia, Lithuania).

* **From Slovenia (Roman)**

1. Rather new Decree on packaging and packaging waste (new regulation, entered into force 24.04.2021) sets obligatory labelling of packaging materials (not acceptable for the industry, many complaints….).

After engagement of CCIS (KPC incl.) with requests to cancel the obligation for labelling of packaging materials, now the Ministry of Environment proposed a change of the abovementioned decree and put it into public consultation (open until 21Sept).

Key proposed changes:

* labelling/marking of packaging materials: mandatory → voluntary
* in case od decision to mark packaging materials: identification system as per COM Decision 97/12/EU has to be used (also for imported packaging: if materials are labelled, labelling has to follow ID system as per COM Decision).

This change after the interventions is an important success for the industry.

1. The Decree on prohibiting the placing on the market of certain SUP products in the Republic of Slovenia and on the labelling of certain plastic products entered into force on 6 Sept. 2021: Among other, it requires the packaging of wet wipes for personal care and household use is labelled with



1. Disinfectants have to fully comply with BPR, no exemptions possible since mid June 2021.

* **From Spain (Pilar)**

At the moment we are focused on the process of processing the waste law and the Royal Decree on packaging and packaging waste.

About the first one the deadline to present amendments by political parties has ended yesterday. The deadline for the presentation of amendments to the text by political groups ended yesterday, and amendments will be made public soon. Then the presentation will be constituted and that will then also be voted in the Plenary.

The second one, as the Ministry has informed us, they do not intend to share the draft of the text with the different sectors because some parts are subject to political decision so we will only know it in public consultation (expected in 2 weeks) and we will then be able to present amendments.

Both transpositions go beyond what is established in the Directives assuming serious implications for the different sectors of the chain for which we are working intensively with them (food, cosmetics, distribution, etc.). Some key points are the plastic tax, the obligation of reuse at the points of sale (regardless of the nature of the products or their classification), ERP (Extended Producer Responsibility) must assume not only the costs that correspond to them but also any other associated with packaging waste, pending on the criteria that will be established to determine if our products will be considered as hazardous household waste, risking representing a total change in the current management system.

Regarding Green Deal, CSS, etc. we are working closely with the Chemical Industry Federation

* **From Sweden (Olof)**

Not much to report from Sweden in addition to what already is on the agenda.  
However, last week our Chemicals Authority, KemI, decided to no longer accept disinfection products that do not fully comply with the BPR. The rules were relaxed a bit in the beginning of the pandemic to maximize the availability of disinfectants since there was a shortage worldwide.  
With help of Google translate you can read further about it [HERE](https://www.kemi.se/arkiv/nyhetsarkiv/nyheter/2021-09-09-undantag-fran-ordinarie-regler-fasas-ut-for-vissa-desinfektionsmedel)

1. APPROVAL OF MINUTES & REVIEW OF ACTIONS OF LAST MEETING (14 June 2021)

Those were reviewed and approved.

1. SELECTED KEY TOPICS

**Enforcement on Essential Requirements for packaging** (A.Scheidgen/L.Sligting)  
Last year the Dutch inspectorate (ILT) started an enforcement process with the manufactures and importers of fabric softeners, regarding the Essential Requirements for packaging (Directive 94/62/EC). The inspection is a response to the publication of the NGO Recycling Netwerk, in November 2019. ILT started the enforcement focussing on fabric softeners, but the scope was recently broadened to other cleaning products. To help member companies comply with the essential requirements in a way that is sufficient for ILT, NVZ is developing a sectorial guidance that will be reviewed by ILT, to ultimately give their stamp of approval.   
This joint case study from Henkel/NVZ was presented to explain to NAC members that inspections on the topic of essential requirements have started in Member States and that these indicated that on the topic, there are/can be many diverging interpretations between authorities and industry and that close support by industry/NAs may be needed. It was proposed to check the level of aspiration of Charter ASP packaging criteria versus the relevant ISO standards, such as ISO 18602-2013 and norms, such as EN 13428.  
**Note:** after the NAC meeting, NVZ has spoken with ILT about the next steps regarding the enforcement process and the intention to share their findings on a European level. ILT explained that they would like to share their findings, however currently there is no appropriate platform to do so. The first step for them is to see whether such a platform can be established, also in light of the upcoming revision of the packaging and packaging waste directive.

* 1. **CLP revision** (M.Rabu/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.

NAC members requested that the A.I.S.E. proposed input to the consultation be sent to NAC ahead of the deadline so that they could also provide input to this consultation. The secretariat also reminded that the A.I.S.E. and DUCC current positions developped so far on CLP revision are available from the extranet ( [cf „Positions” sections](https://aise.wall.idloom.com/#/group/763/wall)).

* 1. **Circular Economy Action Plan (CEAP)** - 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 5.6. 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. The NAC was informed that during the last MC meeting, members had expressed interest in creating (industry) alliances on this topic.
* PC&H sector and Green Deal: 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.

***Break: 12:45 – 13:20***

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

V. Séjourné summarised the developments which have occurred over summer with the results of the work done by two coalitions of consumer NGOs on our products over the last year. These have been covering a vast number of topics from dual quality to provision of hazard information on pack, lack of access on detergent regulation info online, environmental claims, digitalisation etc. She indicated that A.I.S.E has been invited to participate to a panel discussion organised by Euroconsumers (for the CLEAN project) on 30 September and will also have a follow up meeting with someone from NordQual on 21 September. Various A.I.S.E. Working Groups are analysing these findings, and several National Associations in the scope of these regions indicated that they were organising follow up meetings with these NGOS, for example to present the A.I.S.E. Charter in more details. Other activities include the need to re-engage companies in the sector to better comply with the provision of online information (so as to help the broader digitalisation agenda of our association).  
With these learnings, NAC members were encouraged, if not done already, to have a regular and active dialogue with local consumer NGOs on these topics and present well for example, our Charter for Sustainable Cleaning (so that it is not perceived as green claims/green washing).

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

A.I.S.E. has been progressing with the work on the study of the Detergent Regulation. On 8 June, there was a call with the consultant hired by Commission for the Detergent Regulation study. Also, in the past year A.I.S.E. has been collecting information on the relative position of different stakeholders. It was decided it was time to rediscuss the A.I.S.E. strategy on the Detergent Regulation.  
On 25 August A.I.S.E. had 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. November 2021: when it is expected the consultation for the Commission study on the Detergent Regulation to take place
2. the planned A.I.S.E. activity with MEPs in November.
3. The Detergent Regulation Commission WG – **now postponed to December**

The NAC was given an update on the key conclusions of this meeting and the actions A.I.S.E. will take.

The next joint call of the A.I.S.E. Detergent WG and Advocacy SG will take place on 27 September. The conclusions of this meeting will be shared with the NAC in writing, and a proposal is for a webinar to be organised to do this in October.

Some comments made by the NAC:  
- The A.I.S.E. consumer research on how consumers engage with online information should be considered and included in the A.I.S.E. strategy. A strong part of the study is the allergen labelling – the results of the study will be crucial in the strategy.

- A.I.S.E. is writing a technical paper on why fragrance allergens in Cosmetics and Detergents can be labelled differently – this will be shared with the NAC along with the results of the consumer study.  
- For approaching member states, they are waiting for the COM Working Group, and that will be when they will get more information.  
- It was also clarified there were two studies ongoing:

* + - Study on labelling and digitalisation: consultant is VVA and many members of the NAC were contacted
    - Study on the detergent regulation: consultant is Europe Economics and so far only A.I.S.E. and IHO were contacted

***The NAC agreed to the idea of organising a webinar in October.***

***Post-meeting note: date of the webinar confirmed on 8 October 2021.***

* 1. **Digitalisation - A.I.S.E. consumer pilot research for hazard and sustainability info**   
     **& input to Commission study – Latest developments** *(V.Séjourné)*

Progress done in summer on the topic was shared (cf [PPT presentation](https://aise.wall.idloom.com/#/filelastversion/13005) and online demo). This includes our input to the Commission consultation on the Inception Impact Assessment (which NAS may also use as the deadline is open 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. A.IS.E. in in close contact with the 4 NAs in France, Spain, Poland and Sweden to prepare this research and validate the translations.

* 1. **A.I.S.E. Political Outreach European Parliament**  *(S. Zänker/ L.Conti)*

No further comments after pre-reads. A dedicated webinar will be organised in October on the topic for NAC members.

***Post-meeting note: date of the webinar confirmed on 8 October 2021.***

* 1. **Reflections on the future of our industry** - **Thought-starter for the 2030 A.I.S.E.**   
     **Strategy (draft 2/ 16 August 2021)** (S. Zänker)

In the absence of Susanne and due to lack of time, Sari explained that there are 2 main elements to this work: first, any input that NAC may wish to send regarding the conditions for industry to be able to continue operating (i.e. input for a Manifesto that we will be sending to DG GROW); and second, a reflection on possible projects/activities/research that A.IS.E should consider in order to contribute to the Green Deal. Some suggestions have been included in the documents sent as pre-reading and NAC members are invited to send in their recommendation to Susanne directly in the coming weeks.

1. WRITTEN INFORMATION ( [SEE MEETING GUIDE](https://aise.wall.idloom.com/#/filelastversion/12800))

For most topics, please see also the [pre-reads of the last Management Committee](https://aise.wall.idloom.com/#/group/8/files/structure/2698) meeting held on 7 September.

**EPR:** [**Situation across the different Member States**](https://aise.wall.idloom.com/#/filelastversion/12791)*(A.Weber)*On several occasions, e.g., in the context of the PPWD revision, A.I.S.E. has been calling for European harmonisation of EPR, e.g., via robust guidance. However, as EPR schemes are managed at local level, this is rather unrealistic. In this context, A.I.S.E. has been recently approached by the Polish and Hungarian NAs on issues raised concerning ongoing consultations, carried out by authorities at local level. Plans and proposals, which are subject of those consultations, may lead to rather challenging approaches for industry. Input on the topic was provided by national associations during the Tour de Table. The survey ([see pre-reading)](https://aise.wall.idloom.com/#/filelastversion/12792) shows the results of a survey on packaging and EPR schemes that was carried out by A.I.S.E. in 2017.

* 1. **Mandatory sorting instructions platform**: reminder *(A.Weber)*Following the EU Directive 2018/852 on Packaging and Packaging Waste, some Member States are transposing the parts related to the environmental labelling of packaging. Therefore, in the June NAC meeting, the national association directors endorsed the creation of an online platform summarising if, and how individual states are implementing the Directive, or if there are alternative existing communication channels. The platform can be independently accessed and updated by members and its main objective is for the national associations to support one another. The participants agreed to fill in the platform by the end of August. National association directors are therefore kindly reminded to provide their input on the [​docx icon NAC Survey mandatory sorting instructions\_EU Directive 2018852 on Packaging and Packaging Waste.docx](https://aisebxl.sharepoint.com/:w:/s/Data/EdfH5cFaJkRGqtVSdVznybYB3nxWWuIo3aaNALV779KWwA?e=bSlwHM).
  2. **Charter Symposium 2nd edition 2021 on 8 December** *(S.Nissen)*
  3. **Ethanol harmonised classification proposal** (J. Robinson)
  4. **SPERCs** *(G.Sebastio)*
  5. **Update to SUMI guidance** *(G.Sebastio)*
  6. **Air Quality** *(G.Sebastio)*
  7. **Hygiene Communication**- Follow up strategy *(V. Séjourné)*
  8. **UFI communication campaign by/with ECHA** *(V. Séjourné)*

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

1. Next Meeting DateS

Thursday 9 December 2021 - 9:00 – 13:00 - Brussels (A.I.S.E.)

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