### DRAFT

### UKCPI Advocacy, Regulatory & Communications Committee

Minutes of meeting held on Wednesday 20 October 2021

By Video Conference

Present: Mr P Woodhead - Selden Research (in the Chair)

Ms C Berto - Henkel

Ms M Bishop - NicePak International

Mr A Brack - PZ Cussons

Mr R Furse - Reckitt

Mr M Henry - Mirius

Mr A Hill - Robert McBride

Mr T James - ACDOPRO

Mr K Kostanopoulus - Diversey

Ms C Mammah - S C Johnson

Mr S McKay - Greyland Limited

Ms F Nortje - Unilever UK

Mr D Plepys - Clorox

Mr J Pickup - Consultant

Secretariat: Mr P Malpass - UKCPI

Ms C Salter - UKCPI

Mr S Stewart - UKCPI

Apologies: Ms G Bilska-Pietrasiak - Star Brands

Mrs H Fenwick - Unilever UK

Ms N Katsouli - Procter & Gamble

Mr Y Parulekar - Kuraray

**Actions**

32/21 – **Committee Members** to check labelling for flame resistant fabrics

32/21 – **Committee Members** to check for media expert

33/21 – **Mr Malpass** to develop CLP 1 pager

33/21 – **Committee Members** to volunteer to review CLP paper

33/21 – **Mr Pickup** to circulate guidance document

33/21 – **Committee Members** to feedback on guidance document

33/21 – **Committee Members** to identify internal experts

28/21 **Competition Policy Statement**

Prior to the meeting commencing, Mr Woodhead read the Competition Policy Statement:

“UKCPI and UKCPI members shall adhere to UKCPI’s competition law policy and shall not share, directly or indirectly, commercially sensitive information including but not limited to pricing, terms and conditions of supply, business planning or marketing plans. Should the meeting discuss matters that fall outside of UKCPI's legal remit or contravene that policy; the Chairman will close the meeting”.

Mr Woodhead welcomed Ms Bishop and Mr Henry to the Committee.

29/21 **Minutes of Meeting 14 July 2021**

The minutes of the meeting were agreed to be an accurate record.

All actions were complete or covered in the agenda.

30/21 **Matters Arising**

There were no matters arising.

31/21 **Advocacy**

EU Exit Update

Mr Malpass reported that an EU Workability Forum meeting had been held on the 21 September and another scheduled for 9 November. These meetings will continue for at least this year.

Mr Malpass and Mr Stewart had attended several Defra Chemical Policy and Communication Forum (CPCF) meetings recently. There was little feedback at the most recent one, but it was noted that the DUINs scheme will remain available after the deadline to allow companies to come back in to compliance.

Mr Woodhead noted the recent CO2 shortages, closures of fertiliser plant and other shortages and asked what level of Government engagement was involved with these issues. Mr Malpass replied that this is seen by Government as an Industry issue and although civil servants are trying the best it is different at a political level. Mr Malpass added that via the Defra CPCF we have a route to feedback any issues that Members wished to raise.

32/21 **External Affairs**

Flammability/Fabric Conditioners

Ms Salter reported that fabric conditioners and flammability of clothing had appeared in the media a couple of times recently and companies had different approaches regarding labelling for this. The suggestion was to try and develop a consistent position for the Industry. Ms Nortje stated that currently AISE had no capacity or new data to take this up and as such it could be a struggle to get an Industry position. Mr Malpass agreed and as it was not a hot issue it would be parked for the time being.

Mr Stewart added that this was a slightly different topic than had been raised a few years previously that related to laundry detergents and flammability. This was on the back of work carried out in the late 90’s and had led to an Industry agreement to label laundry detergents. Mr James recalled that this was a concern around soap salt deposits on the fabric especially in hard water areas. Mr Malpass suggested that companies should review their labelling for fabrics with flame retardant finishes.

**Action: Committee Members**

RoSPA Latest Launch

Ms Salter reported that the campaign was continuing with 4 recent virtual launches in York, Devon, Bournemouth and Wiltshire. Mr Malpass added that we had now reached out to over 500,000 homes and noted P&G’s Fairy campaign had also included it.

Technical Experts for Media Enquiries

Ms Salter noted that for media enquiries we are often asked for a quote or interview with an Industry expert and wanted to explore the possibility of being able to call up experts from within Member Companies. Mr Malpass added that he was sure there would be a similar system within companies where the original press officer could access internal experts but understood that if it was a negative story then they may wish for UKCPI to respond. Mr Woodhead asked for examples of areas that we might be looking for experts on and Mr Malpass gave examples from Indoor Air Quality, Green Cleaning Products, and packaging. Ms Nortje asked that there be an action for Members to respond to Ms Salter.

**Action: Committee Members**

33/21 **Regulatory Issues**

Detergents Regulations

Mr Stewart reported on the review of the Detergents Regulations highlighted the following areas:

* Scope of the regulation that AISE are lobbying to remain the same but clarity that microbial products are in scope
* Support alignment of ingredient labelling between the regulations and CLP & BPR
* Restrictions of ingredients should be under REACH
* No extension of phosphate restrictions to professional products
* Guidance required for bulk and refill sales
* Retain detergent regulations rather move to other regulations

Mr Stewart added that the Commission was pushing ahead with a delegated act on preservative labelling changes. This will mean labelling of follow through preservatives and the text has been sent to Member States for comment by 26 October.

Mr Woodhead asked for clarity on fragrance allergen labelling and Mr Stewart replied that the GB regulations no longer refer to the EU Cosmetics Regulations but instead to the original SCCNFP. This meant that changes in fragrance allergen labelling at the EU level would not automatically happen in GB. Ms Nortje asked for the timescale for the EU changes and Mr Stewart replied that a draft text would be in 2022. Mr Woodhead asked if AISE was still lobbying for change to the requirement of a medical sheet now that Annex VIII was in place. Mr Stewart answered that they were not it might be difficult to achieve that in GB since we have not adopted Annex VIII.

Biocidal Products

Mr Furse had no significant updates to provide to the meeting. Mr Stewart noted that the active substance renewal date for hydrochloric acid in PT2 products was 28 October. Mr Woodhead noted the HSE efficacy training was being held in November at a cost of £650. Mr Furse added that he was not aware of any new efficacy guidance produced by HSE and would likely still be based on the EU guidance. Mr Furse asked if UKCPI had been in contact with HSE and their future approach to BPR. Mr Malpass replied that he was trying to get HSE to the November Council meeting. Mr Stewart added that he was not aware of a GB biocidal active review programme having been set up.

CLP

Mr Stewart reported on the review of the CLP regulation highlighting the following areas:

* Introduction of new hazard classes including Endocrine Disrupting Chemicals (EDCs) and PBT and vPvB
* Improvement classification for both harmonised and self-classification
* Labelling issues around fold out labels and small packaging
* Scope of regulations and exemptions e.g., Cosmetics
* Improvements to Annex VIII
* Applicability and transitional periods

Mr Furse asked if these changes were all at the EU level and Mr Stewart replied that they were and no UKCPI lobbying had been carried out on the GB regulations.

Mr Stewart had circulated the response from HSE regarding the question raised by the Committee and labelling for hazard classifications that may diverge in the future for products placed on the Northern Ireland market. Mr Furse noted that there was no pragmatism in the response as had been hoped for but at least we were aware of the situation now and the next step could be to discuss with HSE the practical difficulties this raises. Mr James felt that HSE will be tied in to the legislation and this was more likely a political issue and perhaps the APPG would be a better route. Both Mr Furse and Mr Malpass agreed with this and it was felt there was time to develop a strategy as there was currently a light touch to enforcement.

Mr Woodhead added that this was the first issue that had come up for the sector and that it will be that all sectors will have issues. As Northern Ireland is back on the political agenda, he thought initial informal consultations with HSE could help understand what approach could be taken.

Mr Stewart noted that he interpreted the reply as making it clear that the CLP responsibilities for products shipped direct from GB to NI as being with the NI importer. As such that would mean it would be their details that would be on the label. Ms Bishop asked if it could be an EU address but Mr Stewart thought that would only apply if that EU entity was in the supply chain. Mr Furse noted a concern then with products being shipped to a GB distribution centre for a retailer and that retailer then being the importer in NI. Mr James added that in that scenario it was practically unworkable. Mr Stewart noted that there could be a similar impact for products that will need to be CE/UKCA/UKNI labelled for different markets.

Mr Malpass agreed to check with other trade associations but was unclear if Members wanted to park the issue for now or raise with HSE/APPG. Both Mr Furse and Mr James felt that it would be better to leave for the time being and Mr Woodhead thought it would be worthwhile learning more about the newly formed APPG and if other sectors such as food or pharma were having similar issues. Mr Hill also thought it was best to wait but should start to build arguments/strategy in the meantime. Mr James agreed that developing a strategy is key but stressed again that it would be a PR/political issue not a regulatory one and that key influencers should also be considered. Mr Malpass stated that any issues involving NI were very politically driven but that he would develop a 1 pager as a thought starter and asked for volunteers to stress test the paper.

**Action: Mr Malpass**

**Action: Committee Members**

UN GHS & TDG

Mr Stewart reported that the 9th revision of GHS had been published in September and were available on the UNECE website. The reports of the 40th GHS and 58th Dangerous Goods sessions were also available on the website. The next sessions would be held on 29 November to 8 December on Dangerous Goods and 8-10 December on GHS.

Professional Cleaning & Hygiene Sector

Mr Woodhead reported that there were some new faces on the AISE PCHS WG. The WG had been focused on the implications to the sector of the Detergents Regulations review and aspects of the EU Green Deal such as green public procurement. On the Green Deal Mr Woodhead asked if there was something similar happening in GB and Mr Malpass replied that there was no equivalent but there had been rumours of a future GB Ecoflower.

Sewage Treatment Units

Mr Pickup recalled that he was personally involved with his local community-owned pub and recently its sewage treatment unit (STU) had recently stopped working. In his discussions with manufacturers/service companies he was repeatedly told the issue was the increased usage of cleaning/antibacterial products due to COVid. Although this seems to be a tenuous link it appeared to be widely held. Mr Pickup had identified that British Water was the relevant trade association and they had produced guidance on the use of cleaning products and these types of small systems. Mr Pickup felt that there were reasonable parts of the guidance, but some other areas may not be as sensible, and he felt it important that some of these areas may need to be challenged. Mr Malpass agreed that the guidance should be circulated to Members for feedback and, depending on the strength of this, it would be decided if there was further action required.

**Action: Mr Pickup**

**Action: Committee Members**

Occupational Asthma

Mr Pickup recalled that a recent paper from Professors Rook & Bloomfield had a theory that cleaning products could encourage the whole range of allergic and auto-immune diseases through a Th2 adjuvant response. Mr Pickup suggested that the alleged Th2 adjuvant and epithelial barrier effects should be on the UKCPI radar and asked again if there was any scientific expertise within Members on these topics.

**Action: Committee Members**

Mr Pickup had also briefly reviewed a paper from a Norwegian study linked mothers working as cleaners were more likely to have children with asthma i.e., postulated they effect the mother which then has an effect on her children. Mr Pickup noted that the study was based on the mother’s job, rather than exposure or other data, and as such there could be a number of other factors.

26/21 **Any Other Business**

Clean Air Strategy

Ms Nortje asked if there had been any progress on the Clean Air Strategy and Mr Malpass replied that there had been no feedback on our sector.

Cosmetics Updates

Mr Malpass noted that Mr Anderson had previously feedback on any significant developments for cosmetics but with his retirement asked if anyone could pick up the baton. Both Ms Bishop and Ms Nortje offered to assist with this at future meetings.

27/21 **Date/Location of Next Meeting**

The next meeting will be held virtually on 26 January 2022 commencing at 10:30 am.