|  |
| --- |
| NATIONAL ASSOCIATIONS COMMITTEE 03/2020 |
| Minutes | Webex conference call Thursday 10 September 2020,  |

|  |  |
| --- | --- |
| **Participants:** Mr Giuseppe ABELLOMr Peter BOBROVSKIYMr Bernard CLOETTAMs Ana-Maria COURASMs Virginie d’ENFERTMs Helle FABIANSEN Mr Christian GRUNDLINGMr Olof HOLMERMs Inara JONISKIENEMs Sari KARJOMAAMr Thomas KEISERMr Philip MALPASSMr Istvan MURANYIMs Anna OBORSKAMs Jelena PEJCINOVICMs Mihaela RABUMr Finn RASMUSSENMr Thomas RAUCHMr Hans RAZENBERGMr Roman STERBACHMs Françoise VAN TIGGELEN | **From A.I.S.E.:**Mr Dominic BYRNE (partly)Ms Lina DUNAUSKIENE (partly)Ms Elodie CAZELLE (partly)Mr Luca CONTIMs Sacha NISSEN Ms Jan ROBINSON Ms Valérie SEJOURNE (partly)Ms Giulia SEBASTIO (partly)Ms Aisling O’KANE (partly)Mr Mohamed TEMSAMANIMs Susanne ZÄNKER **Apologies:**Ms Pilar ESPINA |

1. WELCOME AND OPENING

The chairperson of the National Associations Committee, S. Karjomaa opened the meeting by welcoming the participants. She reminded that due to COVID we had to shift from the initial idea of a meeting in Madrid to a web conference and took the opportunity to thank again the two Spanish associations, i.e. the one for Cosmetics and the one for Detergent for their started preparations and the swift postponement to 2021.

She also took the opportunity to welcome Luca Conti, the newly hired manager for legal and public affairs at A.I.S.E.

1. APPROVAL OF MINUTES & REVIEW OF ACTIONS OF LAST MEETING (8 June 2020)

The actions from the last meeting were either undertaken or will be covered through the Agenda. The minutes were approved.

1. EUROPEAN GREEN DEAL
	1. **Feedback on webinar for NAC members** (4 September)

The members of the NAC expressed their appreciation to the comprehensive overview of the different documents related to the Green Deal and their statutes in terms of consultations. In particular the general overview documents were qualified as being very helpful. It was reminded that all documents can be found on the extranet in the section of the Green Deal.

The NAC expressed that different initiatives are being discussed also at their national level and foreseen by their respective authorities and therefore the information flow in both directions is very important.

* 1. **A.I.S.E. contribution to Commission Roadmaps and consultations**

S. Nissen updated the NAC directors on A.I.S.E.’s position in response to EU Commission (COM) roadmaps, one on ‘Empowering consumers for the green transition' and another one on ‘Substantiating green claims’. Those were prepared by the Sustainability Steering Group (SSG) with input from the Advocacy Steering Group and other groups of the industry network. PEF/Charter considerations were integrated, i.e. the PEF method identified as not sufficiently mature, especially to provide product comparable information to consumers for sustainable purchase decisions, advocating in parallel for the Charter approach. Following up on the roadmap on the substantiation of green claims, a public consultation has now been published by COM (on 27 August), with deadline for feedback by 3 December. This was initially discussed by the SSG on 9 September.

***ACTION:***

***• Prepare A.I.S.E. reply to the Commission consultation on the substantiation of green claims (SSG/Advocacy SG/A.I.S.E. team)***

In this context, the relevance of the promotion of the Charter was highlighted also regarding the upcoming proposal on 'Mandatory Green Public Procurement (GPP) criteria and targets in sectoral legislation and phasing-in mandatory reporting on GPP' as part of the 'Sustainable Product Policy framework' (expected in 2021). Indeed, discussions have already started in some member states, and for the moment, local authorities seem to focus on the EU Ecolabel to fulfill those GPP requirements. S. Nissen informed the NAC that indeed the June Board agreed to install a specific PC&H Green Deal sub-group, which will address this together with other relevant topics.

***ACTION:***

***- Inform PC&H SG on developments in member states regarding developments on GPP (NAC).***

In addition, A.I.S.E. was contacted by a consulting company that is carrying out a study for COM in the context of the Green Deal. As the outcome of this study will be used by COM to substantiate its activities in the context of the Circular Economy Action Plan, especially with regard to the legislative proposal on ‘Empowering consumers for the green transition’, A.I.S.E. replied to this as well, giving even more weight to our position with regard to our feedback to the official consultation.

A further consultation on the consumer agenda and the green transition is open for comments until 6 October, and A.I.S.E. will prepare a response to cover the relevant chapters of the Circular Economy Action Plan and a selected response to the General Product Safety Directive chapter. Building on first input from the Sustainability Steering Group, a draft will be shared with the Advocacy Steering Group for further input.

***ACTION:***

***- Finalise A.I.S.E. reply to the COM consultation on the consumer agenda (Advocacy SG/A.I.S.E. team)***

* 1. **Political discussions and next steps**

The Secretariat presented a summary of the A.I.S.E.’s dialogues with the Commission and the timeline for the upcoming steps (see presentation).

Publication of the Chemicals Strategy for Sustainability (CSS) is now anticipated on 14 October. The priority areas for A.I.S.E. remain as presented in the webinar. The Management Committee had confirmed the importance to be active on the Mixture Assessment Factor (see item 7.2).

NAC members asked whether the impending harmonized classification proposal for ethanol should be raised in any interactions with DG SANTE. The Secretariat advised that the topic of Covid-19 and disinfectants is on the agenda of the Biocidal Products Committee (of Member States) 24-25 September. This will also be discussed by the PC&H SG on 22 September.

The CSS will include an action plan on PFAS (per- and polyfluoroalkyl substances). The relevance of these substances for cleaning and maintenance products is being assessed. NVZ advised that this is currently a focus area in the Netherlands and agreed to share the report from the environment agency, which mentions such uses.

* 1. **Proposal for adapting the internal governance structure**

The NAC members made no comments on the proposal for internal governance structure, as approved by the Management Committee on 8 September.

1. **REGULATORY ISSUES**
	1. **Biocides COVID 19 & BPR Assessment**

Based on the A.I.S.E. members’ survey on disinfectants availability, it seems that demand remains high, in some countries such demand can be met, in others it is more challenging. The COVID-19 topic will be discussed at the next Biocides CA meeting on 24-25 September (including disinfectants availability, Art. 55, borderline biocides vs. cosmetics). The NAC agreed that the topic of non-compliant products and borderline cosmetics vs. biocides is very complex.

A suggestion was made that A.I.S.E. should propose to authorities a kind of ‘simplified’ authorization procedure for some biocidal Product Types (PT), on the basis that some PT’s are less ‘risky’ than others (like hand disinfectants). A short discussion took place amongst the NAC members, it was mentioned that simplification may open the market to companies being not familiar with the BPR (with potential consequences on the reputation of biocidal products). It was also suggested that the solution may not be about simplifying but speeding-up the evaluation process.

A short update was also provided on the recently launched ‘BPR assessment’ project (refer to the slides).

***ACTION:***

***- Discuss the proposal of a ‘simplified’ authorization process for some product types in the frame of the BPR assessment project (Biocides WG).***

* 1. **Detergent Regulation**

An update was shared with the NAC on the discussion between A.I.S.E. and the Commission on the Delegated Act of Annex VII. This included an important update on the Detergent Regulation in which A.I.S.E. was made aware by the Commission, that they have planned an impact assessment to review the Detergent Regulation. This means that two impact assessments are expected on the topics of Digitalization and the Detergent Regulation, to be carried out in similar timelines.

A.I.S.E. then shared some new information with the NAC specifically on the impact assessment to review the Detergent Regulation. This included recently acquired knowledge on the expected content of the impact assessment, as following:

• The tender will cover the points raised in the ex-post review to the Detergent Regulation.

• It presents the consultant with various scenarios for the future of the Detergent Regulation ranging from “small amendments to a re-write of the regulation or the incorporation of the Detergent Regulation into other legislations”.

• The consultant will need to assess the impact of all these possible scenarios (on competition, on environment etc.)

• Both a public and targeted consultation will be included (expect in a similar timeline as for the Commission tender on digitalization)

The A.I.S.E. position on the Detergent Regulation was highlighted to the NAC:

• The Detergent Regulation was concluded as fit for purpose by the ex-post review. Thus, an opening of the legal text is not proportional to this conclusion.

• Instead the points raised for improvement in the ex-post review can be addressed via Delegated Act or

• Guidance

A joint meeting on the Detergent WG and Digitalization SG has been organised on the 25th September to discuss how to move forward with the two upcoming impact assessments. (The Digitalization work was presented in point 4.3 of the agenda).

A question was raised as to why the Advocacy SG would not join this meeting. It was explained that the Detergent WG and Advocacy SG had already developed a strategy for the Detergent Regulation and A.I.S.E. did not plan to deviate much from this strategy. The meeting on the 25th was aimed at more technical alignment. However, following this the input of the NAC and the Advocacy SG would definitely be requested.

A particular concern would be that by aiming to reduce the number of regulations (objective of green deal), the Detergent regulation could be rewritten or incorporated into other legislations. Some Member states could see this as a positive point since they would no longer have to follow the dossier. Such a change could be detrimental to A.I.S.E as topics specific to detergents would then have to be covered under cross-sectoral legislation. Thus, the NAC was asked to try and understand what the opinion of authorities on the Detergent Regulation is. The next COM Det Reg wg meeting will be held on 21 October.

***ACTION:***

**- *Try and understand the position of their authorities on the Detergent Regulation (NAC).***

A question was also asked as to what the legal definition of preservatives in the Detergent regulation is. Secretariat explained that a reasoning for this was delineated in the legal assessment done for carry over preservatives.

***ACTION:***

***- Share the document once again with the NAC (A.I.S.E.)***

Bulk Sales: A request was raised on the Bulk Sales Documents drafted by A.I.S.E. as to whether this should be made publicly available. This is because it is expected that such products are mainly marketed by companies which are not members of A.I.S.E. or National Associations, however the whole industry will be negatively impacted if these products result in concerns.The NAC was asked for their opinion on this question.

The NAC commented that such products were being placed on the market by A.I.S.E. members and non-members. It was agreed that the bulk sales document created by A.I.S.E., which gave an overview of some of the legal requirements for bulk and refill sale, could be made public.

***ACTION:***

* ***Adapt the current A.I.S.E. document on Bulk Sales for public use (G. Sebastio)***

* 1. **Digitalisation & Ingredient messaging**

NAC members were updated on the fact that the Commission had over summer launched a “Publication of Request for Services by the Commission for impact assessment study on the simplification of labelling requirements and use of e-labelling”. This study is particularly important for A.IS.E. (and other sectors impacted by CLP) as it is going to pave the way for the evolution of detergent labels and use of e-label, in line with the advocacy agenda that A.IS.E has since 2015 (e.g. through BRES project, Digitalisation Roadmap activities). The consultants are now submitting offers to the Commission who will appoint one in December 2020; the final report is due 15 months after in March 2022. A.I.S.E. will seek to contribute constructively to this study so as to achieve the recommendations expected; a preliminary analysis of the survey was conducted by the A.I.S.E. team ahead of a joint meeting of the Det Reg/Digitalisation WG on 25 September to assess notably, whether additional preparations, surveys, activities we can offer as input to this work.

The NAC was given an update on the status of the A.I.S.E. ingredient messaging database. No questions were raised on the database.

* 1. **CLP Annex VIII**

The National Association Committee was informed that the Commission adopted the second amendment to CLP Annex VIII on 31 August 2020. This amendment provides for Annex VIII workability solutions, it is forecast to be published in early November 2020 and will apply from 01 January 2021 (for consumer and professional products within the scope of CLP Annex VIII). The learnings from recent CLP Annex VIII advocacy efforts were also shared with the National Association Committee.

Additionally, it was reported that work is ongoing on the fourth version of ECHA’s Annex VIII guidance (in response to the second amendment to CLP Annex VIII). The Secretariat is actively participating in this process and is working to secure further improvements for membership. Final ECHA Guidance is currently forecast to be published during March or April 2021; draft guidance will be publicly made available by ECHA in the interim.

In response to this presentation, it was highlighted by the National Association Committee that:

• support from some Member States could also be attributed to their lack of preparedness for a 1st January 2021 applicability date.

• certain Member States were unwilling to actively support a second postponement because of the perception that the European Commission did not want a second change of applicability.

The Secretariat concurred with the first point about Member State preparedness, however the motivation for alignment is of secondary importance from an advocacy perspective. Regarding the second point, Member States dutifully following the political will of the Commission is concerning. Member States are entitled to contribute and provide input to the development of a delegated act.

* 1. **REACH review action 3**

The Secretariat presented the draft development plan from ECHA, which is under discussion with stakeholders and the Commission in the ENES (Exchange Network on Exposure Scenarios) Coordination Group. The plan proposes two core elements to improve the quality of extended safety datasheets and to enable tools for registrants, formulators and end users:

- Mandatory minimum requirements for exposure scenarios / safe use information;

- A mandatory xml format for structured electronic communication of the ‘safety dataset’ along the supply chain.

One of the benefits of mandatory xml communication, using a standard managed by ECHA, would be the provision of standard phrase content translated into all EU languages. However, experience suggests that an obligatory transmission format would not be welcomed by industry.

The support of the NAC members is needed to substantiate the costs and/or benefits for companies, particularly SMEs. Direct participation would be welcomed in the REACH Review Action 3 Task Force, which discusses high-level messages but also gives more detailed technical input on specific work items.

The Secretariat will also send a request to the NAC shortly for data to justify the revision of a release factor in the A.I.S.E. SPERCs (Specific Environmental Release Categories).

It was noted that ECHA is forming an SME Panel, and the NAC chair received a list of questions which can be shared with the Secretariat.

***ACTIONS:***

***- Consider joining / invite colleagues to join RRA3 TF (NAC).***

***- Share requests in writing to enable national associations to consult members (Secretariat)***

* 1. **Microplastics**

The Secretariat presented an update on the restriction proposal for intentionally-added microplastics and informed that a technical advocacy document is in development, for publication during the autumn, to support national associations in subsequent engagement with Member State competent authorities. It was noted that the most important element for advocacy is to secure a workable transition period for encapsulated fragrances (at least eight years; five years is not practically feasible and would cause other impacts on the environment, as well as on consumer experience).

* 1. **Drain Cleaners**

The NAC was given a short overview of the project and NAC members who are interested are welcomed to join the TF to remain informed on the topic.

1. **COMMUNICATION AND ADVOCACY**
	1. **National Associations and engagement with retailers**

**Outcome of survey and discussion**

V. Séjourné thanked the NAC members who contributed to the enquiry sent mid-August. The results were shared and a couple of additional countries also provided the situation of retailers’ engagement in their country. Overall, this shows that there is already quite a level of activity occurring in the network with retailers, with some national associations (e.g. Nordic), also including retailers in their membership.

The results will also be shared with the Board in October and a more strategic reflection on the future strategy of A.IS.E. vis-a-vis retails will be followed up.

***ACTION:***

***- Responses if not already sent still possible (till end Sept) via the link provided by V. Séjourné in her email sent on 14 August (NAC).***

* 1. **Consumer Habits Survey 2020**

The proposal for the summary of the habits survey 2020 findings has been progressed over summer and was shared as pre-reading. Members welcomed these infographics and supported its launch on 17 September by A.I.S.E.

NAC members were also informed that a template would be provided as well as other communication material for us (e.g. in social media), so that they could complete the summary with potentially regional (or local) data. It was pointed out though that due to sample size (i.e. 200 per country), some care had to be taken in the reliability of the national data but still, trends can be observed. For more info, please contact A.I.S.E. (V. Séjourné/A. O’Kane).

* 1. **Cleaning & Hygiene Forum 2020 – Format and content**

The proposed programme and draft list of speakers were shared with members, around the theme of value/essential profile of our sector, future Chemicals Strategy for Sustainability, specific case of Biocides, and hopefully, launch of the joint industry/academia guidance with S. Bloomfield. This event scheduled on 2 December p.m. will be transformed as an online event. NAC members supported the theme and content of the proposed programme.

***ACTION:***

***- start approaching potential speakers and organize relevant announcements to internal/external audiences (A.I.S.E.)***

* 1. **COMMSNET**

The statistics (Feb-Aug 2020) for the relaunched cleanright.eu were shared. Since July, the benefits of the product types etc. A communications toolkit including social media animations and visuals is available for your use: <https://aise.wall.idloom.com/#/group/10/files/structure/2092>.

1. **GOVERNANCE**
	1. **Revision of Work Programme: discussion on priorities in 2021**

The NAC was invited to think already ahead as to the priorities in 2021 which should be taken into account when reviewing the current workplan 2020 – 2021, but also in view of the MC/ NAC discussion in March next year when setting the work programme 2021- 2022. It was reminded that in Oct/ Nov the Management Committee is going to make a first analysis whether major amendments would be needed in the half year revision of the current work plan, potentially due to the Green Deal or other emerging issues.

***ACTIONS:***

***- Review the current A.I.S.E. work programme for discussion at the next NAC meeting (NAC)***

***- Add to the agenda of the next NAC meeting in December the workplan revision 2021 (A.I.S.E. secretariat).***

1. **FOR INFORMATION**
	1. **Update on Polymers Requiring Registration under REACH**

A.I.S.E. will participate in the first meeting of the CARACAL Sub-Group on Polymers on 11 September. The Secretariat presented a short summary of the main comments from the A.I.S.E. task force on the report on PRR criteria for the Commission. The mandate for the sub-group runs until the end of 2021, which is quite an ambitious timeframe to establish identification criteria, grouping approaches and registration requirements and to assess the impact.

* 1. **Overview of other REACH topics**

The Secretariat informed about joint industry activities (between chemical producing and formulating sectors) to prepare constructively for an anticipated policy proposal on combined exposures to chemicals (Mixtures Assessment Factor., MAF). An assessment is ongoing of the impact of a MAF on substance registration dossiers and safe uses, and a study is proposed to review the existing science on aggregated exposures. A workshop on the latter is to be co-hosted by the Dutch and Swedish authorities in October.

* 1. **PC & H: topics & date of next meeting**

The next PC&H SG is planned for 22 September with the following items for discussion: European Green Deal, REACH related topics, Organic Food Production. In addition, the organisation to set up a WG on Organic Production is currently in process.

* 1. **EU Plastics Levy**

European leaders have agreed on a new own resource based on non-recycled plastic waste will be introduced and apply as of 1 January 2021. the EU does not prescribe a specific levy to be applied directly to companies, but the tax would take the form of contributions to the EU budget.

The decision on raising the own resources ceiling will require approval from national parliaments. Member States will proceed with its approval as soon as possible. National Associations discussed the potential important impacts of this plastics Levy and highlighted their concerns of yet another tax on the industry, and the need for these financial resources to be earmarked to waste-management infrastructures and policies across the EU.

It was decided that A.I.S.E. would focus its efforts on clarifying the practical and technical details of the agreement. A list of questions aiming to understand the practical side of the upcoming plastic levy will be drawn. These will be discussed with EU representatives in Q3 2020 (Advocacy Steering Group Meetings) in order to provide business certainty to companies going forward.

***ACTIONS:***

***- Ensure the issue of taxation of the industry through EPR Schemes, plastics levy, or other instruments is sufficiently well represented in future policy work and work programme (A.I.S.E.).***

***- Contact EUROPEN and PlasticsEurope to discuss the implementation of the EU Plastics Levy in further granularity (A.I.S.E.).***

***- Engage with EU authorities calling for earmarking of taxation and challenging the continued stress on companies (A.I.S.E.).***

* 1. **EU4Health**

The European Commission has published on 28 May a “Proposal for a Regulation establishing the EU4Health Programme (2021-2027)”. The programme aims to strengthen the EU’s answer to future public health crisis. In practice, the programme’s objectives are to:

(i) increase the reserves of appropriate supplies for crisis (i.e. stockpiling exercise),

(ii) foresee a reserve of healthcare staff and experts that can be mobilised, and

(iii) increase surveillance of health threats across the board.

Individual companies may apply for these funds in case they consider it appropriate (for strategic planning, R&D, negative impacts of the crisis, etc).

***ACTIONS:***

***- Setting up an additional channel of conversation with DG SANTE to understand the details of the programme and how our industry may benefit from it (A.I.S.E.).***

* 1. **Update on Hygiene Communication project**

An update of the project (cf slides) was provided. The main results of the habits survey showcasing the value of our sector to society are planned to be released on 17 September. On the specific part of the survey related to cleaning/hygiene/use of disinfectants, it was pointed out that these results were still on hold as for the moment; a report was drafted with S. Bloomfield (and potentially other academia persons) to promote good guidance on the topic, and as a consequence, comment on the current habits of EU consumers accordingly. A preliminary report was circulated internally (to the Hygiene Comms projects members and Biocides WG) for feedback by 2 September. Comments are being collected to this first draft as both style and content of the current report are sensitive. The Hygiene Comms will next meet on 11 September to discuss the next steps. Such a joint report industry/academia is meant to demonstrate to authorities notably that we are aiming at promoting a reasonable use of disinfectants (so as to serve the overall advocacy objective under BPR - cf future assessment). If we manage to produce such a joint guidance, potentially education material could be developed to fit the EU4Health campaign.

Several companies in the Management Committee that have already been providing comments encouraged others (as well as National Associations) to provide feedback to the current draft, given the potential vulnerabilities/sensitivities.

Finally, it was mentioned that the work on the PC&H comms side will be kicked off after the PC&H SG of 22 September.

1. **TOUR DE TABLE AND EMERGING ISSUES AT NATIONAL LEVELS**

**From Romania**

1. Biocides

*a. COVID context*

- soon the mandate of the Institute Cantacuzino (different body then the National Comm of Biocides in charge on regular basis for approval/authorisation/mutual

recognition) to issue approvals for biocidal products will end; RUCODEM addresed Prime Minister and Ministry of Health to provide regulations for the validity of the documents issued by the Institute Cantacuzino for the biocidal product;

- export of biocidal product: export still banned - excepting where contracts for supply are closed before COVID, products transiting Romania territory, products aimed for donations;

*b. national administrative approval:* products registered in R4BP still requested to fulfil procedures for national approval without being applied the transition foreseen in the BPR; in some cases (biocides used in sanitary units) the procedures for the national administrative approvals requires efficacy tests every 3 years, even though the products are under authorisation and registered in R4BP since last testing;

 2. REACH&CLP&other

- PCC - national authorities on the way to publish the governmental decision with the responsible persons for receiving the harmonised information;

- Explosive precursors: national Law to be amended in order to comply with the Regulation 2019/1148

 3. Draft Law on double standards

 - adopted by Senate, is on the agenda of the Comm of Chamber of Deputies;

**From Russia**

The topic about "dual quality" was raised and how other NAC colleagues do successfully advocate industry's position.

Last December Russian competition state body (FAS) claimed PG and Henkel that their detergents in Russia were not the same as in EU. FAS said that they bought detergents (powder and pods) in Austria and compared with detergents in Russia (Ariel and Persil). In spite of the fact that FAS employee recognized during TV broadcast that they compared non-identical products (just "products we consider to be similar"- it's quote), FAS opened an investigation against PG this summer. They require to put on label the phrase "produced for Russia". But it is out of technical regulation law.

**From Italy**

Plastic TAX

Linked to the Green Deal in Italy from 1 January 2021 a plastic tax will be implemented, calling it a consumption tax (excise). The work packaging per se is not used, however it is clearly covering single use manufactured goods (packaging), closures etc. Multiple use packaging are exempted, also those for medical devices, packaging that is compostable or those plastics that are stemming from recycled plastics. The tax is set at 0.45 €/kg of plastic.

In addition, European leaders have agreed on a new own resource based on non-recycled plastic waste will be introduced and apply as of 1 January 2021 (with a call rate of EUR 0.80 per kilogram).

The Ministry in charge of the implementation declared that the intention is to avoid a duplication. During the next months will be very important to work for workable implementation of the tax.

Supplemental PCC Notification Requirements After Annex VIII - IT

After the decision not to postpone the entry into force, the topic has become very relevant for companies that require more and more information on the topic. Very relevant support will certainly be required especially for SMEs.

In Italy companies must also notify non-hazardous detergents to the national archive set up by the Istituto Superiore di Sanità.

The Ministry of Health is going to publish a Decree that provides that after the entry into force of Annex VIII also the non-hazardous detergents will be notified through the PCN Portal.

This is historically the goal of facilitating poison centres in case of emergency also for this type of products.

The most critical concern is the inclusion of the UFI on the label of non-hazardous detergents, especially in the case of multinational companies with multilingual labels that would have the UFI reference only for Italy. We have addressed this concern with the authorities who seem to have understood the problem and we should have been able to obtain that in Italy non-hazardous detergents notified with the PCN will not have the obligation to put the UFI on the label.

Biocides – Temporary Derogation

In Italy the implementation of the Article 55 of the Biocidal Products Regulation ((BPR, Regulation (EU) 528/2012) that allows a temporary derogation from the BPR requirements has been implemented differently than in many other EU countries as every single product has been evaluated and authorized. The high number of requests that have been submitted to the authorities has led to a considerable delay in authorizations with obvious problems for some companies. To date, even if the possibility of derogation has been in force for a long time, many products still have to be authorized.

**From Belgium**

- DETIC has been consulted by the Belgian authorities who are preparing a National Action Plan for Endocrine Disruptors. The initial step was a debate in the Senate a couple of years ago, to which DETIC had already taken part to for cosmetics. DETIC’s main message is: please don’t take Belgium only position; rather get active at EU level

- In 2018, the Belgian Household Packaging responsible businesses, represented by Fevia (Food & Beverage), Comeos (Retailers) and DETIC took an engagement aiming at having all household packaging either reusable, recyclable or compostable by 2025. We are now trying to avoid having deterrent green dot tariffs for packaging which are not yet such.

From the Netherlands

[See NVZ International Newsletter](https://mailchi.mp/98d409bd7c3d/nvz-international-newsletter-sept2020?e=%5bUNIQID%5d)

**From United Kingdom:**

COVID

No further reports of raw material shortages.

UKCPI worked with HSE to develop guidance on misting, fogging, disinfectant use and regulatory obligations in order to address growth in start ups / ‘entrepreneurs’ offering all sorts of miracle cures and services.

Plastic packaging tax

Worked with UK members and other downstream users to respond to HM Treasury consultation on UK plastic packaging tax, seeking exemptions for plastic packaging that needs to meet transport regulations as well as contain corrosive substances, due into force April 2022.

EU exit

As part of a UK downstream user group we were successful in getting UK Reach registration deadlines extended to up to 6 years.

Continue to work with UK Govt on clarifications required on the future situation in Northern Ireland.

**From Finland:**

- National program on dangerous chemicals (2006-2020) will be relaunched in 2021 as a completely new program with a timespan of at least 10 years. Ministry of the Environment is responsible for the project and the new program will be created in an extensive stakeholder cooperation. The involved partners are Finland’s Advisory Committee on Chemicals (Sari Karjomaa is a member of this committee), a Risk Committee set up by the market control authority and a Science Committee of university researchers (toxicology, ecotoxicology).

- We are preparing a roundtable discussion on Finnish hygiene practices in December. The event is tentatively scheduled in December. The aim is to discuss Finnish hygiene practices from various perspectives, keeping a special focus on COVID-19 learnings and possible future improvements of national stakeholder cooperation.

- The Government's proposal related to the reform of the national Waste Act has led to an extensive political debate especially on waste recycling. For example, current national EPR scheme based on material-based producer organizations could possibly be merged to one organization.

**CONFIRMATION OF NEXT NAC MEETINGS**

* Thursday, 3 December 2020, 09:00-16:00 (web conference, A.I.S.E.)
1. **PROPOSED DATES FOR 2021**

An agenda for the 2021 statutory meetings was circulated. Changes will occur, as Board and MC are also reviewing their availability. Comments to be sent to A.I.S.E.

***ACTION:***

***- Comment on the 2021 dates for the proposed NAC meetings (NAC).***

*Document name: 2020-09-10 NAC Minutes* A.I.S.E., 28 September 2020