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| NATIONAL ASSOCIATIONS COMMITTEE MEETING 04/2020 | |
| Minutes | Webex conference call  Thursday 3 December 2020 09:00-16:00 |

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| **Participants:**  Mr Giuseppe ABELLO, Assocasa  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, F.C.I.O.  Mr Olof HOLMER, K.T.F.  Mr Lukas HORAK, CSZV  Ms Inara JONISKIENE, Likochema  Ms Sari KARJOMAA, TY  Mr Thomas KEISER, I.K.W.  Mr Kevin MAHER, I.C.D.A.  Mr Philip MALPASS, U.K.C.P.I.  Mr Istvan MURANY, Kozmos  Ms Anna OBORSKA, P.A.C.D.I.  Ms Jelena PEJCINOVIC, Kozmodet  Ms Mihaela RABU, Rucodem  Mr Finn RASMUSSEN, V.L.F.  Mr Thomas RAUCH, I.H.O. *(morning)*  Mr Hans RAZENBERG, N.V.Z.  Mr Roman STERBAK, S.Z.Z.V.  Ms Françoise VAN TIGGELEN, Detic | **From A.I.S.E.:**  Mr Luca CONTI  Ms Elodie CAZELLE  Ms Sacha NISSEN  Ms Jan ROBINSON  Ms Valérie SEJOURNE  Ms Giulia SEBASTIO *(partly)*  Mr Mohamed TEMSAMANI  Ms Amelie WEBER  Ms Susanne ZÄNKER |

1. Welcome and Opening

The Chair, Sari Karjomaa opened the web conference by welcoming the participants. A quick Tour de Table was undertaken to see all faces and to introduce the new members, i.e. Kevin Maher for Ireland and Lukas Horak for the Czech Republic.

All agreed to adhere the rules of the competition law.

1. APPROVAL OF Agenda

The agenda was approved.

1. APPROVAL OF MINUTES & REVIEW OF ACTIONS OF LAST MEETING (10 Sept 2020)

The minutes were approved. All actions were undertaken or will be covered through the agenda.

1. Key topics
   1. Short debrief on last Board meeting (S.Zänker)

Most points are covered through the agenda, except for the following points:

- Packaging and Packaging Waste Directive

In view of the revision of this Directive, which is of importance for our sector, and the divergent actions and discussion on each Member State, the Board suggested to make a mapping with the help of the NAC of the situation across the EU.

In the discussion with the NAC, it was emphasised that each national association is working on the topic since years and the support from the companies to successfully achieve at least some harmonisation is important. It was questioned whether the mapping would make sense in terms of keeping it updated as the local developments are moving forward so quickly. It seemed more efficient to act locally directly rather than to try to work from the top to the bottom. It was nevertheless mentioned that companies felt it helpful to get an overview of the local priorities and discussion to better plan ahead.

- Brexit & UKCPI-A.I.S.E.

The Board at its October meeting was informed about the status of the dialogue between A.I.S.E. and UKCPI on the potential options for a future membership of UKCPI at A.I.S.E. to meet the needs for the members of both associations. Those would apply from 1.1.2022 onwards as until then UKCPI remains an Ordinary Member of A.I.S.E. The following points had been put forward:

- Maintain a close and strong relationship between both associations due to business needs;

- Awareness of the regulatory developments on both ends;

- Collaboration on potential crisis and communication aspects;

- Collaboration on voluntary industry initiatives;

- The membership relationship should reflect the level to which A.I.S.E. workplan provides benefits to the UKCPI members;

Ph. Malpass added that his Council asked him to propose a membership relationship based on the above and at least on the basis agreed with Council in Sept 2019 (full rights, 50% fees and review after a further 12 months). At the Board, the company members underlined the need for a strong relationship between both associations due to their business/ trade situation in the EU and the UK. The on-going trade negotiations between both sides should be monitored closely to take into account the outcome, with more clarity expected beginning of next year. It was also emphasised that both associations and the companies’ members of the respective Boards should remain in close dialogue when elaborating a proposal to be presented at the Board meetings in February and April 2021 for submission at the GA in June 2021.   
  
The discussion will be taken up between Ph. Malpass and S.Zänker in January 2021 to prepare for the February Board meeting.

* 1. A.I.S.E. Workplan 2020-2021: update (S.Zänker)

The revised A.I.S.E. 2020-2021 work programme together with the Communication and Advocacy Plan 2021-2022 was presented to the Board the day before the NAC meeting. The NAC was informed that the Board adopted both with no further comments. As to the FTE, it was mentioned that in 2021, it is expected to have again a full team at A.I.S.E., i.e. 15 FTE, which should allow to tackle the work programme, to keep focus on the priorities and expected additions linked to the EU programme in particular consultations relevant for our sector in relation to the Green Deal.

The importance of the collaboration between the national associations and A.I.S.E. was underlined to successfully reach out in the advocacy work. The early engagement and close link is the basis to build a sound advocacy strategy.   
The NAC raised some questions to the different pillars such as e.g. the use of the communication material linked to hygiene, plastic levy, the opportunity to profile the Downstream users also at national level via the 20th anniversary of DUCC next year and where a DUCC subgroup will elaborate a proposal. The NAC was invited to start its reflection for the A.I.S.E. work plan 2021-2022 already now by taking into account its own local priorities when preparing for the discussion at the joint MC/ NAC meeting in March 2021.

*ACTION:  
- Prepare priority setting for the A.I.S.E. work plan 2021-2022 based on the local priorities to facilitate the setting and discussion at the joint MC/ NAC in March 2021 (NAC)*

* 1. Plastic “Levy”: update (M.Temsamani/NAC)

The latest developments at EU-level regarding the Plastics Levy were presented. National Associations recognised that there is merit in opening lines of communication in the network on the topic and learn from each other (political developments at local level, advocacy actions undertaken by the associations, its success or lack thereof, or raise questions to network and secretariat). Although this exchange of information was started during the meeting, it was agreed that a dedicated separate session (workshop) would be more appropriate.

***ACTION:***  
***- Prepare a workshop for National Associations to share situation at local level, actions undertaken, success rate and overall strategies regarding the EU Plastics Levy and local plastics taxes (Advocacy team).***

***Post-meeting note:*** *see mail from M. Temsamani dated 15 December to set a date.*

1. EUROPEAN GREEN DEAL (10:15) (S.Nissen/M.Temsamani/J.Robinson/L.Conti)
   1. Chemicals Policy / Zero Pollution
      1. Chemicals Strategy for Sustainability

* A.I.S.E. assessment of activities
* Joint projects with other industry sectors

The status of activities in the CSS/Zero Pollution Steering Group was presented, including a summary of the priorities for A.I.S.E. identified in the CSS Action Plan (see presentation). These priority areas will be analysed in more depth in the first weeks of 2021 to define workstreams for A.I.S.E. Plans for cross-sector collaboration were also presented; further information is still awaited from Cefic on a holistic impact assessment project. It was noted that it is important for A.I.S.E. as a downstream user sector to participate in this assessment, but to remain in control of its own messaging.

The Secretariat informed that the European Parliament will not respond to the published CSS as a whole, since a resolution was already adopted in July 2020, but may react to specific legislative proposals presented under the Strategy. A set of conclusions can however be expected from the Council of the European Union during the Portuguese presidency; A.I.S.E. will prepare a set of political messages with a view to influencing these.

***ACTION:***  
***- Prepare political messages on CSS and influence the upcoming Council conclusions. (Advocacy and Regulatory teams).***

Zero Pollution Action Plan  
A first draft for an A.I.S.E. response to the public consultation on the Zero Pollution Action Plan will be circulated in December, for further discussion in the CSS/ZP SG and other relevant working groups in January before generating a final version in time for the deadline of 10 February 2021. Releases of secondary microplastics are one of the areas mentioned in the questionnaire for respondents to prioritise for policy action (see also 6.6).

* 1. Circular Economy Action Plan
     1. Latest developments and EP Own Initiative Report

The European Parliament is working on the non-legislative Own-Initiative-Report on the new Circular Economy Action Plan. A.I.S.E. has been active in advocating with relevant Members of the European Parliament by proposing and supporting amendments. The main priority areas identified by A.I.S.E. are: European definition of recyclability; reinvestment of economic revenues in improvement of waste infrastructure; and digital, clearer and simpler label information on safe use of products to be integrated beyond the environmental aspects. The EP ENVI Committee is expected to finalise and vote its Report in January 2021.

* + 1. Substantiation of green claims / Empowering consumers for the green transition
* *Charter and PEF method*

The NAC was informed that the SSG has started with an evaluation on the use of PEF as method for the assessment of environmental impact categories, also in the context of the Charter. The activities covered are on one hand of more strategic nature, such as our positioning concerning Commission plans and requests on the implementation of the PEF method, also with view on the USEtox method; this method is indeed been challenged by industry experts as the right method to evaluate the ecotoxicity impact of a product, especially for the purpose of product comparison at the point of sale. Further technical aspects will have to be sorted out as well, incl.:

- validation, whether the PEF method can be used to identify most relevant environmental impacts for Charter product categories (see presentation for details);

- an analysis to identify potential gaps between the Charter and Commission requests.

In this context, the question was raised, what aspects would be covered by the green claims initiative, and M Temsamani referred to the [Compliance Criteria on Environmental Claims, developed by the Multi-stakeholder Dialogue on Environmental claims to e to support the implementation/application of the Unfair Commercial Practices Directive 2005/29/EC](https://ec.europa.eu/info/sites/info/files/compliance_criteria_2016_en.pdf), i.e. *"The expressions "environmental claims" or "green claims" refer to the practice of suggesting or otherwise creating the impression (in the context of a commercial communication, marketing or advertising) that a product or a service, is environmentally friendly (i.e. it has a positive impact on the environment) or is less damaging to the environment than competing goods or services. This may be due to, for example, its composition, the way it has been manufactured or produced, the way it can be disposed of and the reduction in energy or pollution which can be expected from its use. When such claims are not true or cannot be verified this practice can be described as 'greenwashing'.*

- Exchange with industry sectors

A session with 17 industry sectors, incl. Eurocommerce, FoodDrinks Europe, EUROPEN, and Cosmetics Europe, was organised on 13 November to gather information on the current use of the PEF method in the industry. In addition, participants started to share their position on the PEF method and its potential implementation regarding the two upcoming legislative proposals and beyond. It is foreseen, to continue this exchange, and a next meeting has been scheduled for 10 December. One output of this exchange may result in a common industry position paper.

* + 1. Sustainable Products Initiative

A Public consultation on this initiative is expected for Q1 2021, and A.I.S.E. is going to reply. The legislative proposal is expected for Q4/2021. A.I.S.E.’s position paper on the initiative was submitted to the Commission on 3 November, incl.:

- A recommendation to exclude the vast majority of A.I.S.E. product categories from the planned widening of the Ecodesign Directive because focus of the renewed Directive should be on those product categories for which Ecodesign is the most appropriate regulatory tool.

- A strong suggestion to consider industry voluntary initiatives or self-regulation as an effective approach to demonstrate compliance with product sustainability principles, given that self-regulation and voluntary initiatives have resulted in major and measurable environmental improvements.

- In the context of digitalisation, a reference to our pan-European consumer surveys and findings, which demonstrate the need to get product labels to be further optimised and to move towards digital tools for supplementary information.

* + 1. Packaging & Packaging Waste Directive

The Packaging TF and the SSG are currently preparing answers to a European Commission Public Consultation (deadline 6 Jan 2020). This will be aligned with A.I.S.E.’s position on the roadmap, which was submitted end of July. A joint meeting of the Advocacy SG, the SSG and the Packaging TF has been scheduled for 14 December, where A.I.S.E.’s contribution will be finalised.  
In addition, the ‘Packaging Chain Forum’ is preparing a common industry position paper, which may be supported by A.I.S.E.

* 1. Climate Action

The NAC was updated on recent activities, based on the June and Oct Board mandate on climate action, incl. the strong suggestion of the October Board to shift climate action from priority B to A.  
The ToR of the Climate TF – with so far only 3 companies represented – are being prepared. Taking a science-based approach, it is considered to come up with proposals, addressing all relevant life-cycle stages. First focus will be on the use and production phase, looking on mid-term also into upstream activities, incl. sourcing. In a first step, it will be essential to quantify the climate footprint of A.I.S.E.’s product portfolio, building on available studies. The LCA expert panel will be involved in this work. Furthermore, the TF will prepare an A.I.S.E. position on climate change mitigation.

1. REGULATORY and sustainability issues (11:00)
   1. Charter 2020: Charter Technical Advisory Panel (S.Nissen)

The December Board had approved the Terms of Reference for the Charter Technical Advisory Panel, which had been provided with the pre-reading. This new group will be appointed to improve the governance of the Charter. The idea is to strengthen the Charter members’ engagement and in parallel reduce efforts of the Sustainability Steering Group so it can focus on more strategic aspects (see [presentation](https://aisebxl.sharepoint.com/sites/Data/Common/A.I.S.E.%202020%20MEETINGS/NAC/2020-12-03/PRESENTATIONS/2020-12-03%20NAC%20Agenda%20item%206.1%20Charter%20Technical%20Advisory%20Panel%20ToR.pptx) for details).

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

The Commission is aiming to finalise the Implementing Act for marking requirements by end Q4 2020. The date for entry into force is still highlighted as July 2021 (virtually no chance of this being changed by the Commission). However, A.I.S.E. is still working with NAC on the EU MS understanding that this is not a realistic deadline.

It is A.I.S.E.’s understanding that the Commission has set up several exchanges with EU Waste MS authorities over the next 2 weeks (in view of finalization of the Implementing Act). A final advocacy push has been undertaken making use of the joint EDANA/A.I.S.E. position paper.

* 1. Detergent Regulation (G.Sebastio)

As a next step to the ex-post review of the Detergent Regulation, the Commission is planning an Impact Assessment. This will run between Jan 2021- Q2 2022. Three options will be assessed for the future of the regulation: Revision of the Detergent Regulation, Repeal of the Detergent Regulation, Non legislative options (e.g. guidelines).

Additionally, on 21 October, the Commission held the meeting of experts on the Detergent Regulation and tabled a proposal for a delegated act amending the Detergent Regulation to align preservatives labelling to BPR. It was clear the Commission would progress this only with adequate MS support. This was discussed with the NAC in early November.

Relating to A.I.S.E.’s activities for the Impact Assessment of the Detergent Regulation, and need to engage with authorities, the information that the NAC will be able to gather will be crucial to the success of the dossier. A.I.S.E. shared some material with the NAC as a compilation of supporting arguments Secretariat has prepared for the Detergent Regulation. The NAC was asked to engage with their authorities on the topics, so that industry may begin to engage with the concerns of member states on the Detergent Regulation. More technical comments will also be shared with NAC members of the A.I.S.E. Detergent WG at the next meeting of the group, to be scheduled in January. Our aim would be to discuss the input from the NAC in the next meeting in early 2021.  
The key position of A.I.S.E. is that the Regulation was concluded as being fit for purpose, and thus opening it is not proportional to that conclusion. Instead, improvements can be achieved through guidance and by amendments for scientific and technical progress.

One question was asked from the NAC as to why industry does not want the regulation opened. The reply was: Loosing our leverage if we become a single voice mixed with other industries.   
Also, it is a good transitional position for industry, since the aim is to avoid the topic getting too political.  
It was also clarified that the request of A.I.S.E. to engage with authorities was more general and not related to only the labelling of preservatives and aligning this to BPR.

NAC members then shared some input from their authorities:  
*Belgium:* Not looking for additional work and so will not push for a reopening of the regulation.  
*Romania*: The intention of the authorities is for all chemical legislation to go under CLP and REACH.  
*France:* Not sure the authorities have a clear position on the future of the regulation. However, have two key concerns 1) the labelling and legibility of the detergent label, possibility for consumers to have clearly labelled allergens and preservatives, 2) refill and bulk sales.

NAC agreed to engage with their authorities in early 2021 to understand their possible opinions based on the documents sent by A.I.S.E. **(**[**https://aise.wall.idloom.com/#/group/7/file/10471**](https://aise.wall.idloom.com/#/group/7/file/10471)**).**

* 1. Drain Cleaners (G.Sebastio)

A.I.S.E. gave the NAC a short update on the work being done on drain cleaners and asked the NAC if there has been any activity regarding safety of Drain Cleaners or restricting the use of Drain Cleaners in the member states.  
One comment was made that in Norway over the summer an increased number of incidents with drain cleaners occurred, as perhaps more people were spending time at home. Other NAs echoed the same situation, incl. all kind of detergents. However, there have been no follow up activities.  
The work that has been done by A.I.S.E. on drain cleaners/openers is primarily following engagement with the Swedish authorities, but it can be used by the NAC if there are updates at member state level.

* 1. Plastic Packaging - Perforated sleeves (S.Nissen / A.Weber)

S. Nissen shared that a temporary endorsement has been awarded by the Technical Committee of the European PET Bottle Platform (EBPB) for full body sleeves of Household and Personal Care PET bottles. He presented that this temporary endorsement holds until February 2022, requesting double perforated sleeves, a standardised perforation concept, a harmonised consumer message, a communication campaign as well as tracking of progress on consumer engagement. S. Nissen described that this topic was discussed in the Packaging TF meeting on 16 November 2020. This resulted in recommendations for A.I.S.E. to develop a standardised easy to remove double perforation concept, a harmonised icon together with a standardised consumer message and possibly a ‘zipper’ artwork, and to share this with Cosmetics Europe. Moreover, the development of a communication campaign as well as reporting via the Charter KPIs on the effectiveness of the consumer engagement in removing the sleeves were recommended.

After having brought the topic to the SSG, S. Nissen explained that it was agreed to address the first four actions, i.e. developing a perforation concept, a harmonised icon based on existing work, a consumer message, and to share this with Cosmetics Europe for support as well as to create traction within our industry sector. He described that although there may be difficulties with the translation of a message for multilingual packaging, for now we plan to continue as agreed. S. Nissen reported further that the SSG has agreed that a communication campaign should not be led by the industry sector but rather by national EPR schemes, and that this should therefore be point of discussion at this NAC meeting. Moreover, the SSG has agreed that because of the complexity and different nature of the reporting of consumer behaviour vs. the Charter company-related KPI reporting, this should not be integrated in the latter. S. Nissen explained the MC agreed. Therefore, the next steps will include briefing a design agency on the developments and request one or more harmonised icon(s) based on existing work done as well as a ‘zipper’ artwork, to elaborate a consumer standardised message, as well as to run some tests with industry communication/marketing experts before the launch. Once available, this can then be shared within the industry sector as well as with Cosmetics Europe.

In the following discussion, it was remarked to develop an icon similar to that of other industries, such as the food and beverage industry. S. Nissen highlighted that, since the temporary endorsement is focused exclusively on Household and Personal Care, with no harmonised concept available so far, it is up to A.I.S.E. to take action for our industry sector. Some representatives of the national associations questioned the importance of the development of a harmonised icon as in their countries successful schemes are already in place, while other representatives highlighted the need and urgency for this. S. Nissen elaborated that until recently, little information has been available to A.I.S.E. on the temporary endorsement, and that in the future, the team should act more rigorously to be involved at an earlier stage. It was consequently agreed to continue as proposed with the development of voluntary recommendations for the industry, that reporting of consumer engagement is out of the scope of the Charter KPI reporting, and that respective communication campaigns are indeed the role of national EPR schemes, not to be led by the industry sector.

***ACTION:  
- Follow up on next steps as proposed (Packaging TF and A.I.S.E. communications team).***

* 1. Microplastics *(*J.Robinson)

The NAC was informed that ECHA’s Committee on Socio-Economic Analysis (SEAC) will adopt its final opinion on the restriction proposal on 8 December, and the rapporteurs are proposing to leave open the choice between 5 and 8 years for the transition period for fragrance encapsulates, with a review after entry into force. It would be left to the Commission and Member States to make a decision on the transition period to be included in the REACH restriction; in light of political and media pressure and the language used in the SEAC opinion, they are expected to opt for 5 years, in which case it is vital to ensure that a review is foreseen in the adopted legal text. Technical and political advocacy documents will be provided by A.I.S.E. to assist the national associations in engagement with their competent authorities for REACH in 2021 (preferably in conjunction with the respective associations for fragrances and, where relevant, cosmetics).

The Cross Industry Agreement’s brochure on fibre release from textiles is intended to be published before the end of 2020, to make pertinent information available in the public domain ahead of policy initiatives anticipated under the Circular Economy and/or Zero Pollution Action Plans. In parallel the A.I.S.E. Microplastics TF and CIA Expert Panel are considering key messages for consumers on reducing fibre release during laundry, for potential publication on the A.I.S.E. and/or Cleanright websites.

* 1. Ethanol: harmonised classification proposal *(*J.Robinson)

The NAC noted the status of activity in the industry task force, including the outcomes of a meeting with the Commission on 27 November (see slides). The A.I.S.E. ad hoc task force agreed to look for technical/regulatory arguments to strengthen the industry position, with a view to persuading Greece to withdraw or modify its intention before submission of the dossier. If this is not possible, scientific arguments will need to be submitted to the ECHA public consultation, which could in theory commence in January 2021 although is expected to come a little later in practice. Ethanol does not yet appear on the 2021 work plan for the Risk Assessment Committee, as it cannot be added until the dossier has been submitted.

It was queried whether the ‘Blue Guide’ may help for argumentation, but this Commission document does not apply to the REACH and CLP Regulations. OECD guidelines for substance classification could be investigated for any arguments against use of the contested (drinking) data for a CLH dossier. The legal basis could potentially be challenged, on the grounds that according to CLP Article 36(2), an active substance in the BPR review programme is “normally” subject to harmonised classification and labelling (but this is not an absolute obligation).

The A.I.S.E. TF has appealed to the NAC for intelligence on the views of other Member States about the classification, in case this could help to influence either the Dossier Submitter before submission or the direction of subsequent discussions afterwards. It was noted that ethanol is already designated as a CMR in the Netherlands, and that hand sanitisers without ethanol are preferred *a priori*; this could potentially be argued as regrettable substitution, particularly if prejudices about ‘synthetic’ vs. ‘natural’ chemicals are called into play.

*ACTION:   
- Provide feedback on Member State positions to Secretariat (NAC members).*

1. COMMUNICATION AND ADVOCACY (13:30)
   1. Digitalisation Roadmap update (V. Séjourné/G Sebastio)

The work of the ingredient messaging TF has progressed. The basic structure of the database was agreed, and data collection is nearing completion for the first set of 100 ingredients. The data was collected by consultants and includes assessments by four key consumer apps/media commenting our products and REACH data. Budget spent for far is 9700 Euro. A.I.S.E. will focus on the 100 ingredients to progress the structure and content of the database in the short term. As a next step, to allow members time to discuss the content of the database and how to engage with external stakeholders, a longer call of the Ingredient Messaging TF will be proposed in January 2021.

The NAC was also informed that A.I.S.E. was about to select a consultant to complete its knowledge on the IT solutions that exist. This consultant will be retained in December and progress its work in the first quarter of 2021. In parallel, the Commission is due to appoint its consultants for its 2 studies. An informal workshop will be organised in Jan 21 with other CLP-related sectors to share each other’s perspective and interest to the study.

* 1. Hygiene Communication (V. Séjourné)

Progress made over the last weeks/months (see presentation) was shared, with notably the release internally (for feedback from Biocides WG/Hygiene Comms Experts, cc Management Committee till 10 Dec. 20) of the joint A.I.S.E./IFH report entitled: “Developing household hygiene to meet 21st century needs: A collaborative industry/academia report on cleaning and disinfection in homes & Analysis of European consumers’ hygiene beliefs and behaviour in 2020”. This report is also being circulated in parallel for input from other members of IFH, in addition to Sally Bloomfield who has written he current draft with the A.I.S.E. secretariat.

The structure (i.e. common principles and definition first, followed by an analysis of the consumer habits data observed in 2020) and a summary of the main recommendations of the report were shared. These include the need to follow up with education to consumers on the topic of hygiene and targeted hygiene, but it also hints at the opportunities that exists for a more harmonised and clearer messaging to consumers on products (cf claims). VS also informed the NAC that members’ interest to possibly commission 2 additional guidance on laundry care and surface care with COVID-19 to a group of academia was being sought, also for feedback by 10 Dec.

Based on input from experts, the report and above potential guidance needs will be submitted for final approval to the Board, hopefully early 2021 as well as the proposed follow-up strategy for the future actions by Industry.

NAC members were also informed that the Board had approved to release – in a draft form, on 2 Dec PM- the infographics with some of the key findings that will be further explained in the report. This was approved as a “soft launch”, to be placed on the A.I.S.E. Forum website as Sally Bloomfield was sharing some of those data on her speech on 2 Dec PM.

In addition, a video on the benefits of the A.I.S.E. product portfolio for hygiene, as well as on Targeted Hygiene were released in the Forum that day.

Progress on this whole project was very welcomed by National Associations. Some NAs are initiating similar activities locally and the output of the centrally developed material will be helpful. Some also mentioned activities by some member States locally on the topic of claims (and the use of the word “hygiene”).

* 1. Communications and Advocacy Plan (2021/2022) (V.Séjourné/M.Temsamani)

This plan- also presented with the update work programme (agenda item 4.2) - was approved by the NAC.

* 1. Dual Quality Developments (M.Temsamani)

The European Commission has officially given its mandate to the JRC to research and propose a methodology for the assessment of non-food products. In fact, a “Preparatory Action” is foreseen and budgeted for in the European Commission’s 2021 General Budget proposal. This specific action mandates the JRC to provide further research for alleged differences in the composition of non-food products (including detergents), a research expected to last 18 months.

National Associations from Poland, Hungary, Finland with Sweden and Denmark (a [project](https://www.sverigeskonsumenter.se/vara-projekt/nordqual-in-english/this-is-how-we-work-across-borders/) run by Nordic Consumer Associations) confirmed comparative testing and/or research is indeed currently taking place in their member states. This indicates that the issue of alleged dual quality for detergent is coming back to the forefront of certain member states agenda. It was agreed that A.I.S.E. would continue working on the topic and involve National Associations as appropriate.

*ACTION:   
- Contact JRC and DG JUST to understand the nature of current EU actions, get involved if possible/appropriate (A.I.S.E. Advocacy team).*

1. FOR INFORMATION (14:30)
   1. REACH:
      1. SPERCs (G.Sebastio)

**Relevant for companies with high volume manufacturing plants of granular detergents and low viscosity liquids** (**large scale >10,000t product/a) – both consumer and PC&H**

* + 1. Polymers Requiring Registration (*J.Robinson)*

8.1.3 REACH Review Action 3 development plan (*J.Robinson)*

Refer for all points to the annotated agenda.

* 1. COMMSNET update (A.O’Kane)

Refer to the annotated agenda.

* 1. BPR assessment project (E.Cazelle)

Refer to the annotated agenda.

* 1. COVID-19 (E.Cazelle)

Refer to the annotated agenda.  
In addition, A.M. Couras informed the NAC that there are increasing discussions with authorities with regard to biocidal claims and in relation to this many inspections are on-going. P. Espina reported that the Spanish authorities have recently published a note explaining that the claim “higienizante” is considered as a biocidal claim; discussions on the term ‘hygiene’ are on-going amongst ADELMA membership.

* 1. In-can preservatives (E.Cazelle)

Refer to the annotated agenda.

* 1. Cleaning and Hygiene Forum 2020 (V.Séjourné/M.Temsamani)

National Associations had the opportunity to share their views on the 2 Dec Forum. The event is considered as successful, and G. Abello was warmly thanked for accepting to represent National Associations and the industry’s concerns with the EU BPR.

1. TOUR DE TABLE AND EMERGING ISSUES AT NATIONAL LEVELS

**From Belgium** (Françoise van Tiggelen):

On November 30th, the communication campaign of the Belgian authorities related to biocidal products “in the closed circuit” was launched.  Biocides “in the closed circuit” are products specific for professional users.  The purpose of this campaign is to make sure that concerned professional users are well aware upon the fact that they should *only* use products conform to the current legal frame, knowing that the Belgian legal frame for biocidal products is more advanced than the European one.  DETIC has been directly involved in the development of this communication campaign and supports it fully as it is helpful to make the Biocides legal frame better known to a broader range of companies.

**From Finland** (Sari Karjomaa):

The Finnish Cosmetic and Hygiene Industry Association will organise a virtual roundtable discussion on ‘Finnish hygiene practices – are we doing enough?’ on November 30. The event is open for all interested parties and the speakers represent the authorities, professional cleaning and hygiene sector, academia, the public health institute and a consumer organisation. The aim is to evaluate together learnings from the corona pandemic and to discuss, how we can better manage hygiene issues in cooperation.

**From France** (Virginie d’Enfert):

The French Ministry of Environment along with the Ministry of Health have launched the consultation of the 4th edition of the PNSE = Plan National Santé Environnement (National Plan for Health and Environment). The plan is focused on user’s education about the risk/danger linked to the utilization of chemical product; including detergents and biocides.

One of the actions is focused on the legibility of the detergent labelling and how to improve it.

In parallel, Afise is participating on the multi-stakeholders’ workshop under the Authority of the Ministry of Economy on this same topic, trying to avoid the promotion of a red light signal marking on label.

**From Germany** (Thomas Rauch):

Availability of Ethanol as an active component for disinfection products in the light of the CLH intention CMR class2.

**From Italy** (Giuseppe Abello):

Plastic TAX

Due to the pandemic and having acknowledged the difficulties in implementing the tax, the Government appears to be oriented to postpone the application of the plastic tax to 1 July 2021.

All Italian industry is against the introduction of the tax. At the national level, the industry has asked for the establishment of a national table on plastics also in light of the probable introduction of the European Plastic Levy.

For information, please note that the plastic tax will be a consumption tax (excise). 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.

New obligations to identify packaging materials.

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 labeled 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

Various aspects are highly critical, including the timing implementation given that the entry into force was 26 September 2020

**From Netherlands** (Hans Razenberg): Biocides

The Dutch court has made an arrest in the original case that started the whole Daria case at the ECJ. You can find it [here](https://uitspraken.rechtspraak.nl/inziendocument?id=ECLI:NL:CBB:2020:837) and attached in NL. One particular passage under 3.2 is cause for worry:

“*Ook het beroep van [naam] op de door de Inspectie Leefomgeving en Transport van het Ministerie van Infrastructuur en Waterstaat opgestelde “Leidraad voor de bepaling van de grens tussen reinigingsmiddelen en desinfecteringsmiddelen (biociden)” baat haar niet. De in deze leidraad opgenomen beslissingsboom gehanteerde criteria kunnen niet afdoen aan de uitleg van het Hof van Justitie dat een strikt onderscheid tussen detergentia en biociden niet kan worden gemaakt.*”

Google translation:

“*Nor does [name] appeal to the “Guidelines for determining the boundary between cleaning agents and disinfectants (biocides)” drawn up by the Human Environment and Transport Inspectorate of the Ministry of Infrastructure and Water Management. The criteria used in this guide cannot invalidate the Court of Justice's interpretation that a strict distinction between detergents and biocides cannot be made.*”

We have contacted our ministry for a meeting on this topic, and we also heard through the grapevines that NL enforcement agency is contacting EU counterparts on this.

The NVZ International Newsletter information on SUMIS was published that can be of interest to the NAC.

**From Romania** (Mihaela Rabu):

Biocides  
- National Commission for Biocides is asking for products that are in the Authorisation procedure (and registered in R4BP) and the local approval expired, to be submitted the request for the renewal of the local approval; for biocidal products used in sanitary units this means submitting results of new efficacy tests even though they are the Authorisation procedure (freezing period);

CLP Notification under Annex VIII   
- the local PCC (ReTox) is not fully functioning (IT bugs, substances missing, ranges of pH missing etc), the notification is based on EAN code and the system is not compatible with PCN ECHA; national authorities did not informed us or ECHA about the approach they take related to the notification; we address clarificationto the Minister of Health and await reply;  
- for the PCC there is not yet the Govenmental decision/Order approved.

EU levy - tax 0,80/kg of plastic not recycled   
- there are three ministries that could cover this topic (environment, finances, economy); we addressed all three with request to communicate their position on how the tax will be covered, and await the replies.

**From Sweden** (Anna Melvås):

There is one issue where we get a lot of questions at the moment, and that is the reporting obligation of detergents to the ECHA PCN portal for poison control information. More specifically companies find it very problematic to report health hazardous perfumes, as part of a detergent formula, in the PCN portal. We believe there is a need for further guidance, from AISE, on how to report perfumes that are classified as health hazardous. And there is also a need to make sure that the perfume suppliers report their mixtures to the PCN portal.

It would be valuable to understand if this is an issue in other countries as well and if this could be put on the AISE agenda. We would welcome detailed guidance on the reporting of perfumes and that the issue is discussed with IFRA. (Dominic has been informed and has initiated contact with IFRA.)

1. Next Meeting dateS

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| --- | --- | --- |
| Tuesday 23 March 2021 ***(joint meeting with MC)*** | 13:30 – 16:30 | Brussels (A.I.S.E.) or webconference |
| Wednesday 24 March 2021 | 09:00 – 15:30 | Brussels (A.I.S.E.) |
| Monday 14 June 2021 | 10:30 – 17:30 | Brussels (A.I.S.E.) |
| Thursday 16 and Friday 17 September 2021 | 10:30– 13:00 & 14:00-16:30 | Madrid |
| Thursday 9 December 2021 | 09:00 – 16:00 | Brussels (A.I.S.E.) |

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