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| Management committee meeting 03/2021 | |
| Minutes | Web Conference Tuesday 23 March 2021 10:30-13:00 CET |

**Participants**

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| *By phone:*  Ina Andreasen, RB  Walter Aulmann, Ecolab  Giorgia De Berardinis, Colgate Palm.  Ian Croft, McBride  Pilar Espina, Adelma  Bernd Glassl, IKW  Christelle Henry, Afise  Ad Jespers, Diversey (Chairman)  Gerard Luijkx, Unilever (Vice-Chairman)  Eleni Papadimitriou, PG  Marten Kops, N.V.Z.  Hans Razenberg, N.V.Z.  Rob Roggeband, P&G  Felix Rustemeyer, Henkel *(partly)*  Françoise van Tiggelen, Detic  Edward Whittle, SC Johnson | *From A.I.S.E.:*  Dominic Byrne  Luca Conti  Sascha Nissen  Aisling O’Kane  Jan Robinson  Giulia Sebastio  Valérie Séjourné  Mohamed Temsamani  Amelie Weber *(partly)*  Susanne Zänker |

1. WELCOME AND REMINDER OF COMPETITION LAW

The Chairman, Ad Jespers opened the meeting by welcoming all participants to the web conference. The rules of the competition law were reminded by L. Conti and all agreed to adhere.

1. APPROVAL OF MINUTES & REVIEW OF ACTIONS OF LAST MEETING

The Minutes from the last meeting were approved. As to the actions, all have been undertaken or will be covered through the agenda.

1. Approval of the agenda

The agenda was approved.

1. KEY TOPICS (for discussion)
   1. EUROPEAN GREEN DEAL (S.Nissen, M.Temsamani, J.Robinson, L.Conti)
      1. Circular Economy Action Plan (CEAP)

S. Nissen presented an update of the status on workflows, addressing main priorities as identified by the SSG to get ready for success, meeting the main objectives for the upcoming COM legislative proposals on the substantiation of green claims and consumer empowerment (both expected in Q2). Progress has already been made (during SSG meetings, organised on a weekly basis) on two of the three top priorities, i.e., trying to defend a risk-based approach in the Charter (which means no adoption of Usetox) and the integration of PEF elements in the Charter; work on the 3rd priority, i.e. a method for companies to convey quantitative product information for specific Charter product criteria, which can help consumers with their sustainable purchase decision (and enable comparison) will be initiated soon. In the context of upcoming meetings with the Commission (DG GROW and DG ENVI), it was emphasised to try to organise also high-level meetings with the Commission, especially with DG ENVI. It was confirmed that the Advocacy team is working hard to schedule those meetings, but that it is not easy to get hold of the relevant representatives (which has been confirmed by other industry sectors that are also trying to set up one to one meetings).

An update on the A.I.S.E. horizontal Position Paper on CEAP was made. The paper was finalised and published at beginning of March. The paper lays down the key policy and advocacy messages of A.I.S.E. ahead of the legislative initiatives of relevance for our sector: substantiation of green claims / PEF, empowering of consumers, sustainable product policy, and packaging and plastics related issues. The paper was shared with relevant EU policymakers (EP, COMM and Council) also with the objective of creating contacts ahead of the legislative procedures. No further questions were raised during the call.

* + 1. Chemicals Strategy for Sustainability (CSS)

See minutes of the joint MC/NAC meeting on 23 March for discussion of the A.I.S.E. CSS impact assessment project.

A.I.S.E.’s application for the expert group ‘High Level Round Table on the implementation of the CSS’ was submitted on 18 March. The Management Committee expressed its appreciation for the quality of the application and enquired about possibilities to monitor and support its progress informally; appointments to the group will be made nominally by the Director General of DG ENV, but in practice it will be managed by one of the units, typically B.2 Sustainable Chemicals. The MC was also informed that DUCC also submitted a candidate for the High Level Round Table.   
MC members also asked how round table participants would be briefed for meetings. A ‘Sherpa’ system of experts to shadow the group has been suggested by Cefic, and in A.I.S.E. the CSS/ZP SG would be the lead group to define the sector’s position and provide information to H. Barker if the application is successful.

***ACTION:  
- reach out to Commission contacts where possible (A.I.S.E. Secretariat)***

The MC was informed about the status of short-term priority actions, primarily on planned revisions to CLP and REACH (see pre-reading and slides). It was noted that the new CLP hazard classes could be taken up in the INCPA position on GHS: the EU’s deviation provides an opportunity for advocacy from other jurisdictions.  
The new hazard classes for endocrine disrupting properties will include a category of ‘suspected ED’ as for CMRs, although the science is relatively less well developed for the former than for the latter. In light of the MC decision on regulatory strategy, any scientific arguments arising in the CLP WG could be provided to the CASG process via DUCC and/or Cefic.

M. Temsamani informed that he had participated in a Commission [workshop on Safe and Sustainable by Design criteria](https://ec.europa.eu/environment/events/safe-and-sustainable-design-criteria-chemicals-materials-and-products-first-stakeholders_en) on 19 March, however this mainly provided an opportunity for voicing of individual sector perspectives and did not offer much insight into the Commission’s plans.

1. for discussion
   1. Perforated sleeves icon (V.Séjourné)

V. Séjourné informed the MC that A.I.S.E. was close to finalise a common industry icon and sentence that should come on pack carrying a sleeve as soon as possible (see PPT). Our proposal is currently being shared with the plastic bottle recyclers (EPBP) for feedback. When final advice for them will be obtained, translations and subsequent distribution of the material to industry will be made available for implementation, to be supported, in due course by consumer information campaigns to be held locally by the NAs with their local recycling partners.

* 1. Hygiene Communication – Launch for 7 April- Status (V.Séjourné)

The MC was informed that preparations were underway for the launch of the joint A.I.S.E /IFH report on 7 April, coinciding with WHO World Health day. A one-hour webinar is being organised from 10:00 to 11:00 to launch the report, and adequate coordination is also being organised with the network of NAs so as to have a pan-European launch relayed by the countries.

The MC had no specific comment to the presentation made.

* 1. The Detergent Regulation (G.Sebastio)
     1. Roadmap on Fragrance Allergens
     2. Impact Assessment to the Detergent Regulation

A.I.S.E. has taken two key actions under the Detergent Regulation, to be shared with the MC, to develop the dossier: i) A meeting with the Commission services on the 15th March ii) Webinar on the Detergent Regulation with the NAC.

Meeting with the Commission services on the 15th March

* A.I.S.E. was able to meet with DG GROW following the publishing of their new organigramme where a new unit has been formed on bioeconomy, chemicals, cosmetics”.
* The first point discussed was the roadmap on fragrance allergies. This is the proposal to increase the number of fragrance ingredients to be listed under the Detergent Regulation from 26 to 87. Due to the direct relationship between the Cosmetics Regulation and Detergent Regulation, this is a point of key impact for our sector.
  + Currently the Cosmetics timelines are: 3 years for placing on the market 5 years for withdrawal. The Commission proposed to align the timelines of Detergents to Cosmetics via an FAQ. The Commission did not accept any alternative timelines for Detergents to account for their study of digitalization and e-labelling. A.I.S.E. is collaborating with IFRA to comments from a technical POV on the Cosmetics Regulation Annex III.
* Additionally, A.I.S.E. raised the Delegated act on preservative labelling. This is the proposal to align labelling of preservatives under the Detergent Regulation to BPR/CLP (including carry over preservatives). A.I.S.E. had proposed text to the Commission in June 2020. Commission informed last week that one amendment made following interservice consultation with MS: if the constituent is also a treated article then the preservative must be labelled. Considers carry over preservatives even present at lower limits. However, excludes any situations when the detergent manufacturer is not aware of the presence of a preservative. As next step, a Public consultant is planned (4 weeks), to be approved by member states – COM Detergent WG Oct 2021.
* Finally, A.I.S.E. shared the latest estimation of timings that are expected for the study of the Detergent Regulation. A public consultation is expected in Spring and a targeted consultation in the Summer.

Webinar on the Detergent Regulation with the NAC

On the 8th March A.I.S.E. organised a webinar on the Detergent Regulation for the NAC. A.I.S.E. presented the regulatory arguments for amendments to the Detergent Regulation. The NAC agreed on the A.I.S.E. strategy to advocate externally for minor amendments while preparing “plan B” internally. The key feedback received was that i) there is a gap in the arguments we have regarding what is consumer relevant, ii) A.I.S.E. to define more clearly how digitalisation could be achieved in practice. This feedback will be discussed in the Digitalisation WG.

Some questions were raised by the MC:

* In the context of the developments on fragrances and preservatives, the MC asked if authorities were made aware of the IVDK data showing low cases of allergies for our sector. It was clarified that the authorities were not really considering these arguments. The roadmap on fragrance allergies is tied to Cosmetics data, and thus any input from Detergents is not being considered. Regarding the preservatives, the authorities were worried about certain allergy cases and possibly not well aware of the CLP requirements for detergents.
* On the webinar to the NAC, it was raised that the NAC agreed on the A.I.S.E. strategy to advocate externally for minor amendments while preparing “plan B” internally. However, it was emphasised that while the minor amendments position was fine for an external position; the reality of what would occur was likely to be a hybrid of the various scenarios. The feedback from the NAC was: that a complete repeal of the Detergent Regulation was seen as a negative point; a revision within certain boundaries was the best-case option.

1. FOR INFORMATION
   1. Update of A.I.S.E. position on EU Ecolabel (A. Weber)

The Joint Research Centre of the European Commission is assessing the potential for a revision of the EU Ecolabel criteria for six detergent product groups and has asked stakeholders for their input. With the help of the Sustainability Steering Group, the Supporting Corporate Members Steering Group, the PC&H Steering Group, the Advocacy Steering Group, and the Board sponsors on Sustainability, Virginie D’Enfert and Charles-François Gaudefroy, A.I.S.E. has provided its input on a respective questionnaire, and has updated and shared its [position on the EU Ecolabel](https://aise.wall.idloom.com/Post/Preview?ID=11462). The input has been aligned with Cesio, the European industry association for surfactants.  
In the position paper, A.I.S.E. highlighted to be willing to contribute constructively to the assessment, if certain guiding technical and general principles are addressed when updating the criteria.

The technical principles include:

* the **entire life cycle** of products should be considered, and the criteria should be **science-based**,
* the environmental or human safety aspects of the ingredients should be measured by **objective risk assessments**, and the criteria be **in line with REACH,**
* ecolabelled products should have a **good cleaning performance**,
* there should be better **alignment between EU and potential national ecolabelling criteria,**
* there should be a **clear dissociation** between the criteria for products used in **household** applications and for products and services used in **professional** (industrial and institutional) cleaning applications.

The general principles focus on keeping the **ability for companies to innovate** and **easily adapt** their formulations, hence providing **sufficient flexibility** for meeting the Ecolabel requirements. Moreover, they highlight that EU Ecolabel criteria should **be handled consistently by the competent authorities**. The point was raised whether this will work will involve re-activating the EU Ecolabel TF, and it was agreed to decide based on the feedback from JRC, and the amount of work this will imply.

* 1. Digitalisation:
     1. Update on Commission study/AISE input(V.Séjourné)

Informal contacts have been held with the Commission consultant who should soon be approaching relevant stakeholders to enquire their views about this project. It seems that there is a bit of delay but in the meantime, the preparatory work done during the BRES project and more recently as input to the IT study (cf below) will be used when A.I.S.E. is approached. A meeting of the Digitalisation WG also scheduled on 22 April.

* + 1. Update on IT study commissioned by A.I.S.E. (V.Séjourné)

The delivery of the study contracted by A.I.S.E. to Atrify, and IT consultant is near completion. The final report from the consultant is in finalisation; a debrief to the MC will be organised in due course, once this report will have been analysed by the members of the Digitalisation WG.

* 1. Microplastics: Advocacy focus (M. Temsamani)

The final combined opinion of RAC and SEAC has been published on the [ECHA website](https://echa.europa.eu/registry-of-restriction-intentions/-/dislist/details/0b0236e18244cd73) and been transmitted to the Commission on 23 February. The final Opinion contains no surprises and reflects what was discussed in the December meeting of SEAC.  A.I.S.E. has therefore finalised its [technical advocacy position](https://aise.wall.idloom.com/Post/Preview?ID=11463) as shown attached.

As things move on from the technical phase and contributions to ECHA, the European Commission now has 3 months to draft its amendment to Annex XVII (draft restriction). A strategy confcall with the membership took place on 17 March to discuss the necessary action to be undertaken by the secretariat and the Network of National Associations. The meeting clarified the following:

***ACTIONS:  
- update its Q&A document (reactive position), develop its stakeholders mapping, reach out to appropriate Commission policy contacts, and review the socio-economic input (A.I.S.E.);***

***- prepare a NAC Webinar (A.I.S.E.),***

***- submit comments to the Portuguese TRIS notification (A.I.S.E.).***

* 1. Single-use plastics: wet wipes – latest developments and guidelines (M. Temsamani)

The next TAC meeting on the SUP will take place on 26 March. In the agenda, the issue of the definition of “placing on the market” will be discussed.

Regarding the SUP Commission draft guidelines on scope/definition, those are also on the agenda of the TAC meeting, as the Commission is expected to give a presentation at the meeting. NAs were also again invited to share the cross-industry position paper on viscose.

The corrigendum regarding the symbols and the translation of the Implementing Act for marking requirements was adopted early March. As it is still not clear whether the Commission intends to respect the date of application of July 2021, which is 3 months away, the secretariat has drafted a final letter highlighting the time needed to adapt artwork. National Associations have also been asked to check the appropriateness of the language in the corrigendum in particular for Annex II for wet wipes, as some syntax or font issues may remain.

***ACTION:  
- finalize its joint position paper with Cosmetics Europe and EDANA and share it with the relevant Commission cabinets (A.I.S.E. and advocacy).***

* 1. DUCC 20 anniversary – Summary of recommendation (V.Séjourné)

No additional feedback was provided to the pre-reading. A meeting of the DUCC heads of Associations will review the proposal on 31 March.

* 1. PREPs update (S.Nissen)

In addition to the pre-reads covering the status of discussion on a potential new project heavy-duty / light-duty low-suds liquid detergent for household laundry (35ml formulation vs. a (current) 55ml formulation) and other product categories such as all-purpose, progress is under way concerning a PREP3 in ROM. It was nevertheless mentioned that the amount of human and financial resources to set up the project from practical and legal aspects is nearly disproportionate to the project itself. Situation like this should be avoided in future.

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

In addition to the pre-reading, the Secretariat informed that the Ethanol REACH Association had recently shared a ‘key messages’ document, summarising the main elements of the industry position. MC members suggested that the WHO’s continued support for alcohol-based hand disinfectants should be used as an argument wherever possible.

1. NEXT MEETING DATES

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| Tuesday 20 April 2021 | 10:30 -16:00 | Webconference |
| Tuesday 18 May 2021 | 10:30 - 16:00 | Brussels (A.I.S.E.) |
| Tuesday 29 June 2021 | 10:30 - 16:00 | Webconference |
| Tuesday 7 September 2021 | 10:30 - 16:00 | Brussels (A.I.S.E.) |
| Tuesday 19 October 2021 | 10:30 -16:00 | Webconference |
| Tuesday 23 November 2021 | 10:30 – 16:00 | Brussels (A.I.S.E.) |

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