### UKCPI Advocacy, Regulatory & Communications Committee

Minutes of meeting held on Wednesday 29 April 2020

By Video Conference

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

 Mr B Anderson - NicePak International (by phone)

 Ms A Barker - S C Johnson

Mr M Cooper - PZ Cussons

Ms R Eckley - Unilever UK

Mrs H Fenwick - Unilever UK

 Mr R Furse - Henkel

 Mr J Gourbeault - RB

Mr A Hill - Robert McBride (by phone)

Mr T James - ACDOPRO

 Ms K Josefacka - Coventry Chemicals

 Ms N Katsouli - Procter & Gamble

 Mr K Kostanopoulus - Diversey

 Mr R Maharaj - Ecolab

 Mr S McKay - Greyland Limited

 Mr Y Parulekar - Kuraray

 Mr J Pickup - Consultant

Secretariat: Mr P Malpass - UKCPI

 Ms C Salter - UKCPI

 Mr S Stewart - UKCPI

Apologies: Ms G Bilska-Pietrasiak - Star Brands

Mr M Wood - Coventry Chemicals

Action List:

13/20 - **Mr Woodhead** to circulate claims guidance

13/20 - **Committee Members** to feedback on UKCPI external communications

13/20 - **Mr Stewart** to circulate Clearcast guidance

13/20 - **Mr Gourbeault** to review Clearcast guidance

14/20 - **Committee Members** to feedback on BREXIT thought starter

16/20 - **Committee Members** to feedback on Regional Meeting

10/20 **Competition Policy Statement**

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

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

11/20 **Minutes of Meeting 29 January 2020**

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

12/20 **Matters Arising**

There were no matters arising.

13/20 **COVID-19**

UKCPI Members Communications

Mr Malpass hoped that Members were receiving sufficient information from the Secretariat in what was now an almost daily email roundup. Messrs Woodhead & Gourbeault and Ms Katsouli all agreed that the information was very good. Mr James asked if AISE were doing a similar service and Mr Malpass replied that they were not but instead focusing on discussions with the Commission on the supply of disinfectants.

Mr Malpass asked Members for their continued support in responding to requests for information from Government Departments (BEIS/DIT) and that additional feedback would be welcome.

Advocacy

Mr Malpass reported that UKCPI had been busy with advocacy and highlighted activity on key/essential worker clarification; supply issues (e.g. ethanol) and bleach dilution to get “COVID kill”.

On the issue of bleach dilution, Mr Pickup reported that he had talked with both Sally Bloomfield and Lisa Ackerley as they tried to understand what dilution would give a virus kill. Authorities seemed to suggest 1000ppm but after cleaning. Normally dilution factors on pack give a range of 500 to 1500ppm but does not account for any degradation of bleach with time. IFH are talking to the University of Arizona to try to determine the required log kill but they would prefer to err on the high side i.e. 2000ppm or upwards. Trigger spray products with bleach appear to use 5000ppm. IFH would be happy to discuss this with Industry. Mr Hill asked if IFH were looking at contact time and Mr Pickup replied that they were not carrying out actual tests but desk top searches and most of these seem to indicate 1000ppm in a minute. Mr Hill felt that the advice was mixed, and Mr Furse agreed that there seemed to be a lot of conflicting information on bleach dilution. Mr Pickup asked if there was any risk of increased damage by using 5000ppm rather than 1000ppm but there was limited evidence available to the Committee.

Mr Woodhead noted that currently sodium hypochlorite based products would have had dossiers submitted for assessment under the BPR process and that for PT2 products it was not allowed to claim efficacy for enveloped viruses specifically. Mr Furse asked for clarification on the limit on claims and Mr Woodhead agreed to circulate the ECHA/HSE position. Mr Cooper and Mr Gourbeault agreed that you needed to show efficacy against a specific virus to make a claim and Mr McKay added that as you would not be able to test against COVID-19 you would need to use a surrogate. Mr Gourbeault said discussions on efficacy with the Commission had left it to the National Competent Authority and the dossier submitter to agree any issues.

**Action: Mr Woodhead**

External Communication on Hygiene

Ms Salter noted that the current UKCPI practice is to only signpost to relevant guidance on Covid-19 rather than issue our own and asked for Members feedback to this approach. Mr Malpass highlighted the educational resources that UKCPI also has access to and how these could be used e.g. Hooray for Handwashing; Cleaning v Disinfection; Safe Storage (Take Action Today, Put Them Away); laundry Hygiene; and Hygiene Doctor/IFH.

**Action: Committee Members**

*Post Meeting Note: Ms Salter has developed a* [*COVID guidance page*](http://www.ukcpi.org/features/covid-guidance) *containing links to all relevant guidance for visitors to the UKCPI site. UKCPI promoting this page via mail signatures as well as social media.*

Mr Gourbeault raised the issue with the Clearcast guidance on promoting and advertising anti-microbial products and asked if this could go on to the UKCPI Extranet so Members were aware of it. Ms Katsouli asked if this was general guidance rather than COVID specific and Mr Gourbeault replied that it was. Mr Pickup added that the guidance was originally produced in about 2000 in response to the Industry being subject to lots of complaints regarding emerging antibacterial products. The focus of the guidance was around claims rather than regulation and he felt that in this regard it was likely still sound but noted that the BPR had come along since then and that any review would not be a quick fix. Mr Gourbeault appreciated the feedback but felt it worth checking is it was still relevant and agreed to start the process but thought UKCPI should withdraw its endorsement of the guidance. Mr Furse felt that the review should be carried out to decide if the endorsement should continue or update the document. Mr Stewart was asked to circulate the guidance and Mr Gourbeault asked if it could also go on the Extranet.

**Action: Mr Stewart/Mr Gourbeault**

Mr Malpass asked the Committee how the Association could leverage the increased profile of the Industry now or in the aftermath of the outbreak. Mr Pickup agreed that the Industry was much more appreciated and a raise awareness in how bacteria/viruses were spread. Mr Woodhead stated that Green Public Procurement had seen a real push on using microfibre cloths and asked if these were effective in controlling viruses, but Mr Pickup had no information on this. Mr Gourbeault highlighted the limits/restrictions on the supply chain because of the BPR e.g. Article 95 or needing to have a dossier update approved before going to market. Mr Woodhead also highlighted the supply chain issues with ethanol and denaturants and cross border trade.

14/20 **Brexit**

Mr Malpass recalled that at the last Committee meeting the Secretariat had been charged with mapping regulatory concerns associated with BREXIT. This had been done and had been discussed at the subsequent Council meeting and was back on the agenda at today’s meeting. Mr Malpass noted that the UK would not automatically align with EU Regulations and future changes may result divergence. Mr Malpass asked for Members’ feedback on the thought starter but with a focus on the achievable in the next couple of weeks. Mr Stewart added that it was important to also identify the Industry/UKCPI position on the issues.

**Action: Committee Members**

15/20 **Regulatory Issues**

Biocidal Products

Mr Furse reported back on the latest issues on biocidal products highlighting the following:

* Recent legal case makes almost all cleaning products fall under BPR and AISE will monitor the situation
* There had been progress with the Commission on preservatives and the Industry had been asked for feedback on using QRA
* The Commission was pushing Member States to speed up their activities in the active substances review process.

Ms Barker asked if AISE were seeking an opinion from external Counsel and Mr Furse confirmed that they were.

CLP

Mr Stewart reported back on the latest issues on CLP highlighting the following:

* Annex VIII Guidance – no draft text for next COM meeting in May by Webex. There will be a final consultation step before adoption. Timing is now tight to be finalised and published before end of year. This might lead to a further delay in implementation.
* Future ATPs – still a push for a longer implementation period/sell through. Supported by Crop Protection Sector as their labels also require other regulatory approve (cf biocides). Asked TF for more feedback on artwork costs/timeline.
* AISE consulting on draft guidance on consumer refill and concentrate sales for consumer mixing.
* Multi-chamber products – all quiet at HelpNet at the moment.
* Fold-out Labels – there was no consensus at CARACAL in 2016 but now a feeling to ret-able the proposal.

UN GHS & TDG

Mr Stewart had nothing to report on TDG but the following on GHS. The meetings would take place 8-10 July. Bridging Principle approach had meet with some resistance but option to submit an INF document for the meeting to keep on the agenda. No specific progress on digitalisation and again propose INF document on basic principles. Paper submitted on non-animal test methods and work continues on practical classification issues and simplification on Annexes.

Detergent Regulations

Mr Stewart reported back noting the following:

* Joint meeting of WG with Advocacy on 27 March focused on the review of the Detergents regulations and the positions on digitalisation/labelling, review of dosing information.
* Other topics still include carry over of preservatives, CosIng link, medical data sheet.

The next CLP SG conference call would be on 11 May.

Professional Cleaning & Hygiene Sector

Mr Woodhead reported back from the recent PCHS meeting highlighting the following discussions:

* Phosphate in detergents in the I&I sector driven by the Baltic Sea Action Plan/HELCOM. Mr Pickup had read through the response on the need for phosphates in the formula and the difficulty in replacing it. Replacement had happened in consumer products but it would be useful to know if it had resulted in any actual benefit. Mr Woodhead added that any action would be post BREXIT so the UK could be out of scope but something could be introduced during the review of the Water Framework Directive.
* Committee on Organic Food Production was looking at products used in cleaning of food production areas and for use during processing food.
* AISE request from the Commission regarding supply status for biocidal products

EU Goods Package

Mr Stewart had nothing to report and would take the topic off future agendas.

Explosive Precursors

Mr Stewart had responded to the query raised at the last meeting regarding the requirement to tell another economic operator that the product is subject to the legislation e.g. selling to public or reporting suspicious sale. Mr Stewart thanked Ms Katsouli and Mr Gourbeault for feedback on the use of the extended list of chemicals. Mr Stewart had attended a stakeholder day in London with many retailers present as well as the Government Departments involved. The Home Office is to launch a new reporting portal and will be asking retailers to use this and the extended list. Mr Stewart had submitted general information on the categories likely to contain the chemicals so likely that retailers will contact companies regarding the extended list and their specific products.

16/20 **Any Other Business**

Regional Meeting 30 September

Mr Stewart noted that the next Regional Meeting was currently scheduled for the 30 September and asked for any feedback on topics or if it should go ahead at all. Mr James suggested that if the situation had not improved perhaps a webinar could be considered.

**Action: Committee Members**

UK Authorities

Ms Katsouli asked if UKCPI still maintained good contact with UK Government Departments/Authorities and Mr Malpass replied that it was even more given the current COVID/BREXIT situation. Regarding these topics Mr Malpass felt that they were very responsive although he was slightly disappointed with the HSE response time. Ms Katsouli added that some Member States see cleaning products as high priority whereas in some others it was just hand sanitisers and in that regard Mr Malpass thought that in the UK there would be no interference unless there was a legal basis.

17/20 **Date/Location of Next Meeting**

The next meeting will be held on 15 July 2020 commencing at 10:30 am by video conference.

Future 2020 dates:

28 October at the British Plastics Federation

Website: BPF – <http://www.bpf.co.uk/about_the_bpf/Contact_Us.aspx>