### DRAFT

### UKCPI Advocacy, Regulatory & Communications Committee

Minutes of meeting held on Wednesday 14 July 2021

By Video Conference

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

Mr B Anderson - NicePak International

Ms C Berto - Henkel

Mr A Brack - PZ Cussons

Mr R Furse - Reckitt

Dr R Hastings - Mirius

Mr A Hill - Robert McBride

Ms N Katsouli - Procter & Gamble

Mr K Kostanopoulus - Diversey

Ms C Mammah - S C Johnson

Ms F Nortje - Unilever UK

Mr D Plepys - Clorox

Mr J Pickup - Consultant

Ms L Silva - Ecolab

Secretariat: Mr P Malpass - UKCPI

Ms C Salter - UKCPI

Mr S Stewart - UKCPI

Apologies: Ms G Bilska-Pietrasiak - Star Brands

Mrs H Fenwick - Unilever UK

Mr T James - ACDOPRO

Mr R Maharaj - Ecolab

Mr S McKay - Greyland Limited

Mr Y Parulekar - Kuraray

**Actions**

22/21 – **Mr Stewart** to raise “over classified” labelling with HSE

23/21 – **Mr Stewart** circulated previous Technical Committee email

23/21 – **Mr Malpass** to check with ACI

23/21 – **Ms Salter** to circulate AISE position paper

24/21 – **Mr Malpass** to check for an Industry trade body

24/21 – **Mr Pickup** to draft a literature review

25/21 – **Mr Stewart** to send link to Ms Mammah

19/21 **Competition Policy Statement**

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

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

Mr Woodhead welcomed Ms Mammah to the Committee.

20/21 **Minutes of Meeting 28 April 2021**

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

All actions were complete or covered in the agenda.

21/21 **Matters Arising**

There were no matters arising.

22/21 **Advocacy**

EU Exit Update

Mr Malpass reported that an EU Workability Forum meeting had been held in June with a lower attendance and few issues raised. There would be another meeting in September. Mr Malpass added that the last two fortnightly calls with Defra had been cancelled and HSE had updated their biocides webpage to include new information especially regarding Northern Ireland.

Mr Malpass had raised the issue of the 16th & 17Th ATP to CLP at ACA where there were 3 representatives from BEIS in attendance. Although it was agreed by ACA Members that the government process is not understood but that there was no interest in lobbying for the UK to adopt them. The BEIS response was that there was work underway to manage future changes but that the EU RAC opinions would be just one data source for GB to make decisions.

Mr Malpass reported that HSE had produced a report on the classification of d-limonene and had not agreed with the RAC opinion to change the aquatic toxicity classification and had retain chronic 1. Mr Furse added that he had seen the report in a HSE bulletin service a few weeks prior and Mr Stewart thought the next step would be a public consultation. Mr Woodhead expressed concerns on software used for mixture classifications would not be able to cope with different GB and EU substance classifications. Mr Furse added that there were also concerns about placing a mixture on different territories with potentially different classifications. On this point Ms Katsouli asked that UKCPI to approach HSE and ask if they would accept “over classification” (i.e. when a more severe classification resulted from using the EU CLP inventory) but that a “under classification” would never be used. Ms Katsouli felt this was important as Northern Ireland had to follow EU regulations and that same classification was need for unfettered access to the whole of the UK market. It was felt by Members that it was better to ask now and be aware of the HSE approach rather than wait until there was more divergence between UK and EU. Mr Stewart felt that companies had a duty to use all available information to arrive at the classification of a mixture and was concerned about cases when an “under classification” can be based on other information e.g. DetNet. MrStewart also asked if the EU/ECHA would accept the reverse situation when using GB CLP database gave a different classification from the EU inventory. Ms Katsouli felt that from experience ECHA and EU Members States would accept this but Mr Hill felt that some had not accepted “declassification” based in in-vitro testing. Members agreed that HSE should be approached with the question on the acceptability of “over classification”.

**Action: Mr Stewart**

Ms Nortje asked if there was any information to HSE 2021/22 plans or consolidated regulatory texts. Mr Stewart replied that HSE had produced plans on the REACH process but there was no signs of consolidated texts at the present time.

Plastic Packaging Guidance - Extranet

Mr Malpass reported that guidance on plastic packaging was being placed on the Members’ Extranet. It came from a number of sources such as WRAP, RECOUP and BPF. Any feedback on the guidance would be welcomed.

Occupational Asthma

Mr Pickup noted that in the previous week 3 different papers/editorials had appeared headlining on the action of cleaning products on asthma. One, headlined ‘Time for action on cleaning products’ when looked in to was actually quite balanced on cleaning products but did advocate moving away from spray products. One paper was from Professors Rook & Bloomfield setting straight the hygiene hypothesis but had a curveball in the coverage that cleaning products could encourage the whole range of allergic and auto-immune diseases through a Th2 adjuvant response. Another paper covered the epithelial barrier hypothesis which argues it can be damaged by cleaning products/surfactants with the same promotion of disease.

Dr Hastings had previous published a literature review on this topic which was not designed to give new outcomes but an overview of the existing literature. Dr Hasting stated that this showed that it was almost impossible to give one single source that was giving the increase on incidences of asthma and allergies and so it would be unlikely that you could show that it was a result of using cleaning products. Mr Pickup agreed and that UKCPI had been engaged in the topic for over 20 years but he felt that the first two papers were slightly different as they were stating cleaning products were having a direct impact although it was just conjecture and there was no actual evidence.

Mr Pickup suggested that the alleged Th2 adjuvant and epithelial barrier effects should be on the UKCPI radar and asked if there was any scientific expertise within Members on these topics.

Additionally, Mr Pickup noted a [paper from Exeter University](https://www.exeter.ac.uk/news/research/title_867379_en.html) noticed by Ms Salter which had little reference to cleaning products in the actual paper but was being picked up by the media and being linked to cleaning as a result of them being featured in the University press release.

23/21 **External Affairs**

Flammability/Fabric Conditioners

Ms Salter had checked with AISE to see if they had any position papers on this topic which they had but it was 20 years old. Ms Salter added that today companies have different approaches on the topic and Ms Nortje asked if it was possible for AISE to update they paper and have a unified position. Mr Stewart recalled that a similar discussion had been held by the Technical Committee and number of years ago and agreed to recirculate the email he had sent at the time. Mr Malpass asked what data companies had that they could share and would contact ACI. Ms Salter agreed to share the AISE paper.

**Action: Companies with fab con interests/Ms Salter/Mssrs Malpass & Stewart**

RoSPA Latest Launch

Ms Salter reported that RoSPA had held their latest [Take Action Today Put Them Away](https://www.ukcpi.org/home-safety-campaign-comes-to-calderdale/) campaign in Calderdale in conjunction with local health workers. The work continues to be supported by UKCPI and future launches are being planned.

24/21 **Sewage Treatment Units/Septic Tanks**

Mr Pickup is personally involved with his local community-owned pub and recently its sewage treatment unit (STU) had recently stopped working. In his discussions with manufacturers/service companies he was repeatedly told the issue was the increased usage of cleaning/antibacterial products due to COVid. Although this seems to be a tenuous link it appeared to be widely held. Mr Malpass agreed to check if there was a trade body that represented the Industry. Mr Furse suggested this could be a topic for a research project and Dr Hasting felt a starting point could be the first step and Mr Pickup agreed to make a start on that.

**Action: Messrs’ Malpass & Pickup**

25/21 **Regulatory Issues**

Detergents Regulations

Mr Stewart reported that the AISE Detergents WG had met on 4 June having previously met with the consultant that is drafting the proposals for the review of the regulations. AISE had fed in the Industry position on issues such as preservative labelling, testing laboratories based in the EU, fragrance allergen labelling and digitalisation.

Mr Stewart added that there was a new contact, Sally Roberts, at HSE for the GB regulations.

Ms Nortje asked if it would be acceptable to “over label” for fragrance allergens and Mr Stewart replied that he was not aware of the legislation prohibiting it but did not know if that was the Industry approach,

Biocidal Products

Mr Furse reported that HSE had updated their website including information on how to apply to have products placed on the Northern Ireland market. This would incur an administration fee but Mr Furse was not sure of the level of fee. Mr Furse added that HSE had started the evaluation process for dossiers that had to be resubmitted and were issuing invoices for the work. Ms Mammah asked if there was an additional authorisation number for Northern Ireland and Mr Furse replied that as far as he was aware you would be issued a UK number. Ms Katsouli asked if it had been clarified who you submit to for NI and Mr Furse replied that you would submit to HSE and indicate if the product was for GB, NI or both.

CLP

Mr Stewart reported that there was a new AISE Manager for the CLP portfolio and that a meeting of the TF had been held earlier in the week when it had discussed 40th CARACAL meeting (Chemical Strategy for Sustainability, more than one constituent substance, simplification and digitalisation of labelling and 18th ATP), and new guidance to the poison centre notification.

UN GHS & TDG

Mr Stewart reported that the UNGHS subcommittee had met 5-7 July in Geneva and papers would be available from the UNECE website. The topics of interest were use of non-animal testing methods, classification for germ cell mutagenicity, practical classification issues and improvements to Annexes 1-3.

Professional Cleaning & Hygiene Sector

Mr Woodhead reported that the PCHS WG was also discussing issues such as Detergents Regulations, BPR and occupational asthma and had nothing specific to added.

26/21 **Any Other Business**

Poisons Act

Ms Mammah asked if as the UK had not adopted the latest EU explosive precursor regulations would the UK default back to the original 1972 Poisons Act and Mr Stewart agreed to provide a link to the latest UK regulations.

**Action: Mr Stewart**

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

Format to be confirmed in Sept but be held on 27 October 2021 commencing at 10:30 am .