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| Management COmmittee meeting 06/2020 | |
| Minutes | Webex conference call  8 September 2020, 10:30-13:00 |

### Participants

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| * *By phone:* * Ina Andreasen * Walter Aulmann * Giorgia De Berardinis * Bernd Glassl * Christelle Henry * Ad Jespers (Chairman) * Marten Kops * Gerard Luijkx (Vice-Chairman) * Dieter Nickel * Eleni Papadimitriou * Rob Roggeband * Felix Rustemeyer * Anna Sass Andersen * Françoise Van Tiggelen * Edward Whittle | *From A.I.S.E.:*  Luca Conti (partly)  Lina Dunauskiene (partly)  Sascha Nissen  Aisling O’Kane (partly)  Jan Robinson  Giulia Sebastio (partly)  Valérie Séjourné  Mohamed Temsamani  Susanne Zänker  *Apologies:*  Ian Croft  Pilar Espina  Thomas Rauch  Hans Razenberg  Yu-Ting Chen |

1. **WELCOME AND OPENING**

The Chairman opened the meeting by welcoming the participants, in particular Felix Rustemeyer becoming for Henkel the new company representative as Dieter Nickel will soon retire. Ad Jespers also welcomed Luca Conti, the newly appointed manager for legal and public affairs at A.I.S.E.. A short “tour de table” was undertaken to visualize via the video camera the different faces.

The Management Committee members were also reminded the rules of the Competition law and all agreed to adhere.

1. **APPROVAL OF THE AGENDA**

The agenda version 2 was approved with the following addition: 4.2.2.: Quats

1. **APPROVAL OF MINUTES & REVIEW OF ACTIONS OF LAST WEB CONFERENCE (30 June 2020)**

The Minutes from the last meeting were approved. All actions have been carried out or will be covered through the agenda of this meeting.

1. **KEY TOPICS (for discussion)** 
   1. **European Green Deal:**
      1. A.I.S.E. contribution to Commission Roadmaps and consultations

The Management Committee was updated 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 will be discussed by the SSG on 9 September.

***ACTION:***

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

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 Oct, 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 SG 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

M. Temsamani and J. Robinson presented the latest information available on upcoming priority initiatives related to the Chemicals Strategy for Sustainability (CSS) and Circular Economy Action Plan (CEAP) - see slides. As regards the CSS, in particular, it was agreed to prepare a public communication in time for the publication of the Strategy (i.e. Press Release commenting on areas of interest) expected for 14October (tbc).

As regards CEAP, the MC supported the proposal to engage in advocacy contacts to promote our industry position and prepare the grounds for the upcoming legislative proposals.

[A.I.S.E.’s Overview document](https://aise.wall.idloom.com/#/group/887/file/9446&InGroupNotebookList=false) was also presented as the “go-to” source integrating all relevant information of interest to the membership (key Green Deal initiatives, timelines, A.I.S.E actions). Members commented on the value of the document, and recommended to further build on it, by adding further granularity and information.

A conversation was also held on the appropriate internal structure, alignment between internal task forces, and existing working groups under the next agenda point.

***ACTIONS:***

• ***Prepare a draft press release ahead of the release of the CSS in October (V.Séjourné / M.Temsamani / J.Robinson)***

***• Further build on the Green Deal Overview document highlighting for example areas of concern and/or internal assessment, for example SWOT (M.Temsamani)***

* + 1. Proposal for adapting the internal governance structure

A proposal of a governance structure to deal with the different chapters under the Green Deal within the A.I.S.E. groups was presented to the Management Committee. During summer, the Sustainability Steering Group had discussed on how to best address all activities under the Green Deal, so that the different work streams would be best organised, ensuring on one side the development of actionable proposals for the different Steering Groups (see presentation) and on the other side delivery in an efficient, coherent, strategic, and holistic way. There was an in-principle agreement on this structure, in particular on the chapters related to sustainability; Management Committee members asked for further clarification concerning the work stream on the CSS and ‘Zero pollution’.

***ACTION:***

***• Prepare proposal for October Board on internal governance structure (A.I.S.E. team)***

* 1. **Digitalisation:**

Management Committee members were updated on the fact that the Commission launched over summer 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.I.S.E. (and other sectors impacted by CLP) as it is really going to pave the way for the evolution of detergent labels and for the official use of e-label, in line with the advocacy agenda that A.I.S.E has since 2015 (e.g. through BRES project, Digitalisation Roadmap activities). A consultant to run the study will be appointed by the Commission in December 2020; the final report is due 15 months after, i.e. 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 to be further discussed with members at the a joint meeting of the Det Reg/Digitalisation WG on 25 September with the aim to assess, notably, whether additional preparations, surveys, activities should be undertaken..

1. **REGULATORY /SUSTAINABILITY** 
   1. **Ingredient messaging**

The Management Committee was given an update on the status of the ingredient messaging database.

Companies were thanked for their contributions so far and asked to remain engaged in the task force for this project to move forward as this is an important pillar in the A.I.S.E. Digitalisation strategy and a key tool in influencing the Commission for impact assessment study on the simplification of labelling requirements and use of e-labelling.

A comment was made that A.I.S.E. Secretariat should look at the ingredient database created by a member of Cosmetic Europe which was considered a good example.

* 1. **Biocides**
     1. BPR Assessment

Following the agreement of the MC, the ‘BPR strategic assessment’ project was launched early July, in collaboration with EBPF(CEFIC). The MC was informed about the progress in identifying and selecting potential consultants to support the project (for details, refer to the slides). Two final offers have been received, one from ERM (total cost 63.650 EUR, proposed sub-contractor: Fieldfisher) and one from CEHTRA (total cost 78.750 EUR, proposed sub-contractors: Fiedal, SCC and Spectra). Based - amongst other things - on the discussions with the consultants over summer and the total cost, the A.I.S.E. and EBPF Secretariats recommend working with ERM. The A.I.S.E. Biocides WG members working on the project and EBPF MC agreed with this recommendation. The A.I.S.E. MC validated this choice.

Regarding the budget, the A.I.S.E. MC approved the proposal to equally split the costs between A.I.S.E. and EBPF (as done in the past for other projects), i.e. a total of about 32.000 EUR for A.I.S.E. spent over 2 years.

***ACTION:***

* ***Sign the consultancy contract to launch the work on the BPR assessment. (A.I.S.E./ EBPF)***
  + 1. EU4Health programme and compliance of disinfectants

The European Commission 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 amongst other things to increase the reserves of appropriate supplies for crisis (i.e. stockpiling exercise) for crisis relevant products (i.e. disinfectants).

Following a massive cut in the budget for the programme by the EU Member States, it is unclear at this stage how this would impact the proposal and the European Parliament position. A.I.S.E. will engage in further information gathering.

The issue associated with the increase of non-compliant disinfectants in the EU was also highlighted. The issue is on the agenda of the next Biocides MSCA meeting (end Sept) and some MEPs are publicly raising concerns on non-compliant products. The MC was consulted on the need to prepare any public or holding statement to address this issue. After an exchange with the membership, it was decided against taking action.

***ACTION:***

***• Engage with EU institutions to maintain the inclusion of disinfectants as crisis-relevant products.***

***• Investigate opportunities to link ongoing A.I.S.E. communications efforts to this programme with the Commission (M. Temsamani/L. Conti).***

* + 1. In-can preservatives

Guidance from the Management Committee was sought on the following points (for details refer to the slides):

- *Development of a “guidance/ best practice” on how to perform QRA.*

ECHA had been given the mandate by the Commission to look closely at the QRA method for skin sensitisers. After two short discussions at the ECHA BPC Human Health WG, ECHA concluded that it is not possible to develop a reliable guidance on how to perform QRA. ECHA will report on this at the next CA meeting (24 Sept). In parallel, A.I.S.E., CEPE and EBPF also tabled a position paper for discussion at the CA meeting. A question may come from authorities whether industry is willing to take the lead in developing a best practice document on how to perform QRA. R. Roggeband indicated that P&G would support development of such guidance and could provide resources, providing engagement from other members. I. Andreasen and G. Luijkx also expressed support and will check for internal expertise to contribute.

***ACTION:***

***- Check for experts and get back to E. Cazelle by 22 September (MC).***

- *Active defence of OIT*

Recent discussions with OIT suppliers indicate that issues are to be expected for the approval of OIT under BPR: OIT is classified as skin sensitiser with a Specific Concentration Limit (SCL) of 15 ppm; similarly to what was done few years ago for MIT (work done by the A.I.S.E. Sensitisation TF in collaboration with MIT suppliers), a QRA would be needed in order to defend OIT. In addition, issues are expected on environmental aspects. Due to lack of resources, the MC recommended not to engage in the defence of OIT, and recommended instead to focus the resources on the defence of BIT (work on-going with suppliers to avoid a potential classification as skin sensitiser with SCL 15 ppm) and the development of a ‘best practice’ on how to perform QRA.

* + 1. Quats

This topic was added during the meeting by F. Van Tiggelen as apparently in Belgium questions about this compound are being addressed. An article published in the Regulatory Toxicology and Pharmacology 116 (2020) 104717 was circulated to MC members just after the Webex, relating on human health hazard assessment of quaternary ammonium compounds.

* 1. **Microplastics**

The Management Committee was informed about the A.I.S.E. submission to the public consultation on the SEAC draft opinion, and the plans for advocacy documents to support engagement with Member States in the next phase of the restriction proposal (see presentation).

The Management Committee was also updated briefly on the work of the Cross Industry Agreement on microplastic release from textiles, and it expressed support for expediting the publication of a manuscript on the solubility/biodegradability of polyvinyl alcohol films used in liquid detergent capsules (if agreed by the co-authors).

* 1. **RIWG: Terms of Reference updated**

The Management Committee approved the updated Terms of Reference for the REACH Implementation Working Group.

The updated Terms of Reference for the Drain Cleaners Task Force were also approved and members agreed to the continuation of this group on an ad hoc basis for one more year, to evaluate the feedback of authorities, in particular by Sweden on the voluntary safe use advice provided by A.I.S.E.

* 1. **CLP WG Terms of Reference**

The CLP Working Group Terms of Reference were presented to the Management Committee and unanimously approved.

* 1. **CLP Annex VIII**

The Management 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 MC to use the findings in future advocacy activities.

In response to this presentation, the Secretariat’s efforts were welcomed. It was asked if there was further scope for improvement on CLP Annex VIII. The Secretariat reported that further improvements to the legal text were not foreseen. However, work continues on ECHA’s Annex VIII guidance. The Secretariat is attempting to secure further improvements via the development process for this latest version of ECHA’s guidance. Final ECHA Guidance is currently forecast to be published during March or April 2021.

* 1. **Ethanol** (presented by B.Glassl on behalf of Thomas Rauch)

The Management Committee was informed about the intention of Greece to submit a harmonised classification & labelling dossier for ethanol by the end of 2020 (a requirement due to its inclusion in the BPR active substance review programme). The proposed classification includes Reproductive Toxicant Cat. 2, which would have a significant impact for the products of the A.I.S.E. membership and could potentially lead to regrettable substitution with more hazardous solvents. Furthermore, it was noted that on a strictly toxicological basis, ECHA’s Risk Assessment Committee might judge a more severe classification to be appropriate, which would increase the impact even further.

Although A.I.S.E. does not normally defend individual substances, the Management Committee agreed that ethanol is a high priority for the sector as a whole. This is currently being monitored on an ad hoc basis by the Secretariat and is on the agenda of the RIWG, but it was agreed that it should be incorporated in the revision of the A.I.S.E. work programme.

The Ethanol REACH Association has been gathering input from a range of industry sectors, A.I.S.E. included, to develop a collective industry position. It was agreed to await their proposals and then to develop A.I.S.E. advocacy messages accordingly.

***ACTION:***

***- Include advocacy work on ethanol in revised work programme, for discussion at the next meeting of the MC (A.I.S.E. Secretariat) .***

* 1. **A.I.S.E. in vitro Project**

The Management Committee was provided with a progress update on the A.I.S.E. in vitro Project. It was reported that 16 re-formulated products are (tentatively) expected to commence lab testing during September 2020 (final schedule to reported by the testing lab upon test item delivery). The Management Committee welcomed this development.

* 1. **ERASM: new projects, proposal for informal platform on LAS**

The Management Committee expressed appreciation for the revised initial scope of the proposed project on surfactant grouping and its interim budget. Further information is expected to be available at future meetings of the MC following discussion in the ERASM technical committees.

The Management Committee supported the participation of A.I.S.E. in an informal platform on LAS, as this would facilitate better exchange of information between sector associations (A.I.S.E., CESIO and CLER). CESIO will also discuss this in an internal meeting in September.

***ACTION:***

***- Inform CESIO about A.I.S.E.’s decision on the LAS platform (A.I.S.E. Secretariat).***

* 1. **Philippines Guidelines (added topic)**

The documents and rational to approach the Philippines authorities had been circulated in pre-reading. R. Roggeband explained that the authorities are currently preparing Guidelines on requirements for certain household products on informing about hazardous substances. Even if the process at the Authorities level seemed quite advanced, it was agreed to reach out with a letter stemming from A.I.S.E. to share their experience with CLP and the concerns to the requirements foreseen by the Philippines authorities. A similar letter has been sent by the US association ACI.

***ACTION:***

***- Based on the above discussion send a letter to the Philippines authorities (A.I.S.E. Secretariat).***

Post meeting note: The proposed letter was sent by S. Zänker on 9 September.

1. **ADVOCACY AND COMMUNICATION** 
   1. **Update on Hygiene Communication project**

An update of the project (cf slides) was provided. In short, it is planned to release the main results of the habits survey showcasing the value of our sector to society on 17 September. On the specific part of the survey related to cleaning/hygiene/use of disinfectants, it was pointed that these results were still on hold for the moment; a report was being drafted with S. Bloomfield (and potentially other academia persons) in order to promote good guidance on the topic, and as a consequence, include comments 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 the style and content of the current report is 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.

***ACTION:***

***- Send comments to the reports from S. Bloomfield to V.Séjourné prior to 11 September meeting (members). Hygiene Comms project to progress the work.***

* 1. **2020 Habits survey results – Infographics and distribution**

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.

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

The proposed programme and draft list of speakers was 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. Management Committee members supported the theme and the proposed programme.

***ACTION:***

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

1. **FOR INFORMATION ONLY** 
   1. **REACH**

The Management Committee was informed that ECHA had shared a draft for the RRA3 development plan on 4 September, for discussion at the upcoming meeting of the ENES Coordination Group on 15 September. The draft has been circulated for comment in DUCC and in A.I.S.E. will be discussed in the RIWG on 9 September and also the RRA3 Task Force. ECHA is looking to industry (DUCC, Cefic) to take a position on a mandatory XML standard for electronic transmission of safe use information along the supply chain.

* + 1. Review Action 3/ ENES + work plan

Refer to Annotated Agenda

* + 1. Use maps

Refer to Annotated Agenda

* + 1. REACH SUMIs

Refer to Annotated Agenda

* 1. **Polymers Requiring Registration**

The Management Committee was informed that the A.I.S.E. Polymers Task Force has held four conference calls since June, including one on 7 September to prepare for the first meeting of the CARACAL Sub-Group on Polymers on 11 September.

The task force has active and engaged participants, but to date still no chair. The Secretariat asked MC members with colleagues in the Task Force to follow up on this internally. At the start of the next call the Secretariat will need to inform the Task Force that its continuation is contingent on appointment of a chair.

***ACTIONS:***

***- Speak to colleagues (relevant MC members);***

***- Inform Polymers TF and report back at next MC meeting (A.I.S.E. Secretariat).***

* 1. **PC&H**

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. Concerning Medical Devices, the MC was thanked for their support to allow for the setting up of the group, which had its first meeting end of August.

* 1. **Plastics and Packaging:**

PPWD consultation:

A.I.S.E. responded to the EU Commission public consultation on a proposal for a directive to ‘review the requirements for packaging and other measures to prevent packaging waste’. The reason for this proposal is that current essential requirements, dating to 1994, do not provide the regulatory push for design changes for re-use and recyclability as they are not fully aligned with the waste hierarchy. They also leave too much room to interpretation, hindering enforcement. For further information, see A.I.S.E. response (enclosed document).

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.

As a first step, a new own resource will be introduced and apply as of 1 January 2021 composed of a share of revenues from a national contribution calculated on the weight of non- recycled plastic packaging waste with a call rate of EUR 0.80 per kilogram with a mechanism to avoid excessively regressive impact on national contributions.“

Issues around taxation were particularly highlighted as an increasing concern by National Associations, meaning further work on the Plastics Levy and other taxation schemes may follow.

***ACTION:***

***• Focus on clarifying the practical and technical details of the agreement (A.I.S.E.).***

*PS: A list of questions aiming to understand the practical side of the upcoming plastic levy has been drawn. These will be discussed in Q3 2020 (Advocacy Steering Group Meetings) in order to provide business certainty to companies going forward. Further work may follow.*

1. **FIRST PROPOSAL FOR DATES IN 2021**

A proposal for dates of the Board, National Associations Committee and Management Committee had been shared with the Management Committee in the pre-reading documents. Changes will still occur as the members of the other groups have not been consulted. The Management Committee members were invited to check the dates and inform the A.I.S.E. secretariat in case of unavailability. If too many members have difficulties on a specific date a new one will be proposed.

***ACTION:***

***- Inform the A.I.S.E. secretariat by end of September if proposed dates for the Management Committee in 2021 would not be feasible (MC).***

1. **NEXT MEETING DATE:**

Web conf on **Tuesday 20 October** 2020, from 09:00 – 13:00

*Document name: 2020-09-08 MC Minutes* A.I.S.E., 22 September 2020