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| national associations commiTtee meeting 04/2021 |
| Minutes | Web conference Thursday 9 December 202109:00-13:00 CEST |

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| ***Participants TBC:*** *By phone*Mr Giuseppe ABELLO, Assocasa Mr Petr BOBROVSKIY, APCoHMMr Bernard CLOETTA, SKW Ms Ana-Maria COURAS, A.I.S.D.P.L.Ms Virginie d’ENFERT, AfiseMs Pilar ESPINA, Adelma Ms Helle FABIANSEN, KoHBMr Christian GRUNDLING, FCIOMr Lukas HORAK, CSZVMs Inara JONISKIENE, LikochemaMs Sari KARJOMAA, KHMr Philip MALPASS, U.K.C.P.I.Ms Anna MELVAS, K.T.F.Mr Istvan MURANY, KozmosMs Anna OBORSKA, P.A.C.D.I.Ms Jelena PEJCINOVIC, KozmodetMs Mihaela RABU, Rucodem Mr Finn RASMUSSEN, V.L.F.Mr Thomas RAUCH, I.H.O. Mr Hans RAZENBERG, N.V.Z.Ms Marijana SABLIJC, HGKMr Roman STERBAK, S.Z.Z.V.Ms Françoise VAN TIGGELEN, Detic | ***From A.I.S.E.:****By phone*Ms Cindy CHHUONMs Majlinda COBAJMr Luca CONTIMs Elodie CAZELLEMr Dave HEMINGWAYMr Sascha NISSENMs Aisling O’KANE Ms Jan ROBINSONMs Valérie SEJOURNE Ms Giulia SEBASTIO Ms Susanne ZÄNKER *Apologies*Mr Thomas KEISER, I.K.W. Mr Hallar MEYBAUM, EKTL |

1. REMinder on competition policy

The rules of the Competition law were reminded, and all agreed to adhere.

1. Welcome and approval of agenda

The Chair, Sari Karjomaa opened the meeting by welcoming the attendees to the web-conference. She welcomed, on behalf of the NAC, Dave Hemingway who will attend his first NAC meeting. The agenda was approved with one addition, i.e., 5.8 Update on the PSP for Liquid capsules review.

1. APPROVAL OF MINUTES & REVIEW OF ACTIONS OF LAST MEETING (16 SEPt.2021)

The [Minutes](https://aise.wall.idloom.com/#/filelastversion/13216) from the last meeting were approved. All actions will be covered through the agenda.

1. GOVERNANCE
	1. **Short debrief on last Board meeting** *(S.Zänker)*

Main points from the Board meeting discussion:

1. Advocacy work: The Board suggested to work out comprehensive outreach plans, involving the NAC for
- CEAP linked to Green Deal and the Charter, and
- CSS: Marco Mensink (DG of CEFIC) presented at the Board how CEFIC undertook an orchestrated communication campaign parallel at local level and “Brussel’s” level on the results of their economic impact assessment on the CSS run by Ricardo. The way CEFIC approached the Commission was very open, agreeing on the vision of the Commission’s Green Deal objective, but calling for a dialogue to design the “transition pathway”. (The full CEFIC report can be downloaded using the following link: [Economic-Analysis-of-the-Impacts-of-the-Chemicals-Strategy-for-Sustainability-Phase-1.pdf (cefic.org)](https://cefic.org/app/uploads/2021/12/Economic-Analysis-of-the-Impacts-of-the-Chemicals-Strategy-for-Sustainability-Phase-1.pdf)).
Some of the NAC members indicated that hardly any communication from their respective chemical associations in their countries was undertaken, to inform them about the status, the main messages and next steps. For more details see also Board Minutes.

For both dossiers, technical and advocacy work is in progress and a plan should be presented at the next Board meeting (see also agenda item 5.7).

1. Ensuring financial viability: report from the “Financial TF”

H. Fabiansen as member of the TF addressing the mid-to long-term shared with the NAC the slides presented at the Board on the previous day on the analysis of the financial situation and developments. The A.I.S.E. budget will be impacted due to a loss of membership income due to UKCPI and one supportive corporate member, the inflation/ legal obligation of salary indexation and on the other hands the increased workload mainly linked to the Green Deal. ([see slides](https://aise.wall.idloom.com/#/filelastversion/14537)).
She explained that the Board gave the mandate mid-year to set up a small TF, when it was identified that the financial viability is impacted to look for potential ways forward. After having examined different areas to reduce expenses, different options/ scenarios were presented to compensate the decreasing income via an increase in membership fees, after also having looked at the savings of expenses.
The NAC thanked her for the presentation and update on the Board feedback, which was asking for a prioritisation of the work plan, looking at the fixed expenses and potential acquisition of new members.

***Discussion****:* The NAs expressed their surprise about the situation and the increase of A.I.S.E. fees, and made the following points:

* NAs will need a very strong justification and added value at national levels to have their Boards accept an increase of contribution to A.I.S.E.; any increase would also mean an increase of their membership fees at local level, and consequently for the A.I.S.E. members an increase at both the local and the EU level.
* Indexation of salaries should be disconnected from indexation of overall budget. 4% indexation on salaries does not mean 4% increase of the overall budget. It was explained that the payroll however represents 63% of A.I.S.E. main budget.
* The risk for A.I.S.E. to lose some NAs as A.I.S.E. members if a higher contribution to A.I.S.E. is requested; in this context the situation as to the 2 national associations linked to A.I.S.E. through a service agreement was raised and also Greece to explore their capacities to pay membership to A.I.S.E.
* The importance for the PC&H sector: streamlining A.I.S.E. workplan should not lead to less involvement for the PC&H sector. Otherwise, it will be even more difficult for the PC&H companies to justify their contribution to A.I.S.E.
* The development of the reserve of A.I.S.E. seemed unclear to the NAC, and therefore more explanations should be provided.
* It was also proposed to have a more holistic approach i.e., by looking on the potential savings, both on project costs and (back-)office costs, if CE and A.I.S.E. would be merged.
* NAs are themselves under high financial pressure from their members for many reasons and are obliged to find alternative solutions to maintain their income (e.g., finding new members), hence a strong objection of any increase of their membership fees to A.I.S.E.
* Need to ensure good communication between the A.I.S.E. company members at A.I.S.E. level and at local level.

***Proposed ways forward to be explored:***

Look again on costs versus savings, taking the following aspects into account:

* Prioritise A.I.S.E. workplan and maintain FTEs at a minimum level, assessing also activities that cease and that potentially temporary increase such as the Green Deal
* Budget and priorities must be examined by all members and A.I.S.E. management who shall come back with a proposal for acceptable increase of fees in a transparent and granular way.
* Underline what additional output will A.I.S.E. provide with increased resources, i.e., value versus costs for all member categories
* Zero budget exercise: spare on all possible expenses, i.e., revaluate fixed expenses (offices, consultants, meetings….).
* Differentiate between legal required indexation increases from budget increases.
* Acquisition of new members: Jan mentioned interest from new potential Associate members on Polymer TF. It was also underlined that the fee of Associate members is very low for the service they get from A.I.S.E., potentially increase of the basic membership fee. (Remark: in scenario 2 of presented budget simulation, already included 1 new AM every year).
* In order to better grasp the real figures versus the relative increase, a table could be added to outline the actual increase. It was reminded that in absolute figure it is about 200K, to be distributed among all members.
* Transparently list the costs and also show the development of the reserve.

***ACTIONS:***

***- Provide input to the work plan with the aim to further streamline by indicating areas to be postponed/ deleted by mid-January (see also agenda item 4.2.)(NAC)***

***- Progress work taking into account the above comments from the meeting of the Board and the NAC next day; presenting the higher and lower figures. (Financial TF)***

***- Organise a call with NAC on the finances after the next Board meeting (A.I.S.E. secretariat)***

**Post-meeting note: next NAC call is on 20 January, a day after the extra-ordinary Board call.**

* 1. **A.I.S.E. Workplan 2021-2022: update** *(S.Zänker)*

The work plan review was started at the MC at its November meeting with the aim to not only include recent changes but also to try to streamline and prioritise the topics. Before digging into the review an overview of the most recent achievements was presented, to illustrate the progress of the work and the value of the Network to the industry. See presentation made at MC [HERE](https://aise.wall.idloom.com/Post/Preview?ID=14546)

The Board also called for a clearer prioritisation of the topics, to better manage the resources of both the A.I.S.E. secretariat and of the members. However, at this stage, it is a rather difficult task, as the demands and expectations from the members are quite divergent. The NAC mentioned that equally at local level, they need to do a similar exercise. The next MC on January will run again the exercise to set priorities, also with the aim to prepare for the discussion at the March joint MC/ NAC meeting where the work plan 2022 – 2023 will be discussed. Find [workprogramme HERE](https://aise.wall.idloom.com/#/filelastversion/14545).
***ACTION:
- Feedback to A.I.S.E. areas of lower priority by 14 January 2022 (NAC members).***

1. SELECTED KEY TOPICS
	1. **Microplastics restriction** (J.Robinson)

The NAC was reminded of the anticipated timeline for the Commission’s restriction proposal, with a first discussion having been anticipated in the REACH Committee on 7/8 December ([see slides).](https://aise.wall.idloom.com/#/filelastversion/14539)  No participant had heard anything from competent authorities about a draft having been shared with Member States by the Commission, but in the Netherlands the environment ministry had asked industry about an [analysis](https://eeb.org/wp-content/uploads/2021/11/Analysis-of-emissions-of-MP-to-2030-November-2021-final-1.pdf) published recently by NGOs EEB and ClientEarth. A reactive holding statement from A.I.S.E. may be useful to address such questions.
It was remarked that the ongoing discussions on Polymers Requiring Registration might impact on microplastics. Although the Commission has insisted on keeping these two regulatory discussions separate, it was acknowledged that PRR may be a complicating factor in the Commission’s plans and timing.
***ACTIONS:
- Inform A.I.S.E. and NAC if a draft restriction proposal is obtained (NAC members).
- Consider preparing reactive statement on NGOs’ report (A.I.S.E. Secretariat).***

* 1. **Potential restriction on skin sensitisers in consumer mixtures** (J.Robinson)

The NAC was reminded of this potential future restriction mentioned in the restrictions roadmap, and of the pro-active advocacy campaign launched by IFRA Europe (see slides). The idea is believed to have been initiated by Denmark, where nothing has been heard yet from authorities, but the Danish Consumer Council is launching a campaign (together with counterparts in Belgium and the Netherlands) to test for fragrance allergens in detergents. It was noted also that the Finnish dermatologists’ society has expressed strong critical views about allergens in household products.

NAC members confirmed that they supported the low-key approach agreed by the A.I.S.E. Advocacy Steering Group in September, as the nature and scope of any restriction are still open and under discussion. Any NAC member seeing an opportunity for constructive discussion with their MSCA is invited to support the outreach programme of IFRA (already arranged in Poland).
***ACTION:
- Inform A.I.S.E. Secretariat if approached by IFRA or to volunteer to support their outreach (NAC members).***

* 1. **Biocides**  (E.Cazelle)

An update was provided on the following topics (refer to the slides): in-can preservatives and BIT, ECHA efficacy guidance, BPR assessment project, borderline between disinfectants and cleaning products (for reference, link to the [Darie case](https://curia.europa.eu/juris/liste.jsf?num=C-592/18)). On the later, it was suggested that the A.I.S.E. Biocides WG liaises from the start of the discussion with the Detergent WG.

The A.I.S.E. secretariat also proposed to organise a training on the Biocidal Product Families concept for the A.I.S.E. membership (including members from NA’s).
**ACTION:
- Send in January to check interest from the members in such training (E. Cazelle).**

* 1. **Detergent Regulation** (G.Sebastio)

There are various topics under discussion for the Detergent Regulation, as following:

1)General revision of the Detergent Regulation
A.I.S.E. had a working session with Commission on 9 November to engage with authorities on the Detergent Reg. and bring forward some technical points. Feedback was received on various topics.

* COM said they do not plan to place the Detergent Regulation in the NLF or repeal the regulation. This is based on input they received and current discussions. Their timing for next steps are for the public consultation to be sent in December and the targeted consultations to take place in Dec 2021/Jan 2022 (likely delay on this)
* Commission do not plan to consider CMRs and EDs in the Detergent Regulation. Acknowledged it is a REACH topic
* Commission is very concerned and interested on the following topics. These topics were discussed in the latest A.I.S.E. Detergent WG and the following decisions and actions are being taken in the context of the Detergent Regulation revision.

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| **COM concern** | **A.I.S.E. Action being proposed** |
| **Digitalisation and simplification on detergent labels** | A.I.S.E. completed our consumer research on this topic and will present it at the Commission Detergent WG on 15 December |
| **How microbial cleaning products are regulated** | Ad hoc subgroup created to provide a guidance on the topic in the short term |
| **Biodegradability of non-surfactant ingredients** | Action for A.I.S.E. to collect voluntary initiatives being done by the sector to promote more biodegradable, non-surfactant ingredients |
| **Clarify dosage requirements for consumers and extending dosing requirements** | A.I.S.E. Detergent WG proposed revising guidance to clarify dosing requirements and extend dosing requirements to other product categories |
| **Phosphates/ P use in our sector** | Tomorrow PC&H experts will design a survey to collect data on this topic. |

On 10 December a group of PC&H experts will design a survey to collect data on Phosphates/P use in our sector. The aim of the survey is data collection to avoid a **blanket ban** on P use in detergents for PC&H and I&I. To create an inventory of and to quantify actual phosphate use across Europe and identify the most critical applications for our industry.
***Timing*:** distribution by 10 December 2021. Responses are requested back to A.I.S.E. by 10 January close of business. Internal aggregation will follow, with submission to the Commission of aggregated European data by mid-January.
Data Confidentially collected. No individual company or country data to be published.
***ACTION:
- A.I.S.E. requests the support of the NAC for Distribution to companies/SMEs of Survey.***

Some questions/ comments were raised:

* What will A.I.S.E. ask in the survey? There are three key parts to the survey i) to understand if there has been a natural decrease in P use in our sector (due to the cost of the ingredient) there are questions on P release over different years. ii) some questions on alternatives iii) Norway has proposed threshold values for P in product categories. We want to understand if companies could comply to these levels and if not, why not.
* There was confusion at COM level between Phosphate/P – it is good to ask about P. It is better to request a bit more data, to improve the argumentation.
* IHO shared that they already gave some input on examples and are in support of the A.I.S.E. survey. It would be good to show the contribution of the sector is negligible. Shared the proposal from Norway with the chair of their Professional Laundry group and the feedback is that these values are too low. It will not be possible to clean with the proposed P threshold values.
* The point on how STP varies is different countries was made. If there is good STP, there should be no release of P in the environment.
* Decreasing P means you increase organic. Need to find out if this is an issue for sewage treatment plants.

***Conclusion: NAC agreed to support in distributing the A.I.S.E. P survey***

2) Labelling of preservatives

As was shared previously with the NAC, Commission reacted positively to A.I.S.E. proposal for preservative labelling. Commission suggested for AISE to present our paper to member states at the Commission Detergent WG on 15 December. Legally, an amendment to the Detergent Regulation could be proposed via Delegated Act. The legal text could be amended to include the principles of the A.I.S.E. proposal and then specific values for preservatives could be included in the legal text.
***ACTION:
- A request is made for an update from the NAC regarding any feedback received from Member States on the preservative topic and the Detergent Regulation.***

3) Labelling of fragrance allergens

The proposal to expand the fragrance allergen list of the Cosmetics Regulation is ongoing, and will have a direct impact on Detergents. Commission has confirmed they will align to the timing for implementation of the Cosmetics Regulation.
To support the work on digitalisation, the A.I.S.E. Digitalisation WG would like to liaise with fragrance allergen experts and will approach the Information Network of Departments of Dermatology (<https://www.ivdk.org>) for a session regarding fragrance allergens at a next meeting of the Digitalisation WG.
The aim of reaching out to dermatologists would be to: better understand the methods of testing for these ingredients, what is the science available, what information is someone who is diagnosed with fragrance allergy given, rates of allergy for detergents?
***ACTION:***

***- A request is made to the NAC, for contacts of other dermatological experts in member states, that A.I.S.E. could engage with on the topic.***

Some input was shared:

* In DK there is an expert institute of dermatologists, but if A.I.S.E. were to engage with them, would need to be careful as they may be critical. However, this is an engaged/ active institute.
* FIN – On the cosmetics allergy portal of the Helsinki Allergy and Asthma Association, consumers can easily find the right cosmetics and hygiene products for them (when aware of one's allergies).
* RO – asked A.I.S.E. to share an ‘invitation letter/ short summary’ of a request. This could be shared with the association of professional dermatologists in Romania.
* It was also discussed that in DK the consumer association (DCC) is doing a survey on allergies in perfume under the headline “watch out for allergens in perfume” to be published this/ next week.

A.I.S.E. may take a stepwise approach, first contacting IVDK (and also IFRA) with whom there is a good relationship. Then may extend to other stakeholders.

The NAC was thanked for their valuable input.

* 1. **A.I.S.E. EP Political Outreach** (D.Hemingway)

In mid-November, A.I.S.E. organised a Political outreach towards Members of the European Parliament. A.I.S.E. Secretariat and Members met more than 20 MEPs’ offices with the objective to introduce A.I.S.E. activities and policy priorities for this legislative mandate, as well to start establishing contacts with their Offices ahead of future collaboration.

During the NAC Meeting, A.I.S.E. Secretariat presented the main aspects and lessons learned of this Outreach, as well as discussed further A.I.S.E. political advocacy towards EU co-legislators in 2022. In particular, it was discussed the NAC members advocacy involvement for the outreach to the Member States (Council). A strategic plan for this activity will be jointly undertaken by NAC and Adv SG to be implemented in 2022.

* 1. **Digitalisation: Commission study and results from A.I.S.E.’s research**  (V.Séjourné)

Recent findings from consumer research held in FR, POL, SP and SWE on simpler label options and provision of hazard and sustainability information online were shared by V. Séjourné. (See summary slides in the extranet).

In a nutshell: The data confirmed that the simpler label proposed by A.I.S.E. is the one favoured by consumers, and that the value of information provided on a website (via QR code) is greatly appreciated by consumers. It also indicates that allergen information is wished to be labelled in an exhaustive way (50% of the sample). And that the alternative label with all ingredients listed is not the one favoured by consumers. Providing online more details on how a brand meets the Charter criteria is also very much appreciated. These findings are therefore supportive to the A.I.S.E. strategy. On allergens, it was mentioned that liaising with additional independent experts (e.g., IVDK) was being organised, to complement expert’s views. (see also agenda item 5.4.)

Those findings were not discussed in detail and still need to be analysed by the relevant A.I.S.E. groups (SSG, Digitalisation WG, Detergent Regulation WG, CLP WG). However, the strategy for the next steps, concerning hazard information, proposing to present these data at the upcoming Commission Detergent WG meeting on 15 December, was supported by the Board, as very timely. A.I.S.E. will also contribute to the Commission Public consultation on the topic open till 16 Feb 22.

* 1. **European Green Deal: Activities on CEAP – debriefing from meeting with COM DG ENV on A.I.S.E. technical proposal (30 Nov)** (S.Nissen)

Objective of the meeting on 30 Nov with Emmanuele Maire, Head of unit DG ENV Sustainable Production, Products and Consumption, and her team was to retrieve COM feedback via an open discussion to our technical proposal, i.e., to develop together a successful cleaning and maintenance industry scheme by introducing PEF criteria into the A.I.S.E. Charter.

**Main learnings**

* COM did not say ‘NO’ to our proposal: BUT, they do not know / are not fully convinced on how to react at this moment of time to a hybrid Charter/PEF
* Continued struggle of COM to finalise the legal proposal of ‘Green claim substantiation’ package, which is now expected for March 2022
* The full deployment of this initiative is expected to take several years
* Complex situation with member states (e.g., France, which is well progressed with their own laws on circular economy and climate action
* “Governance” seems to be a new idea (governance/helping the market operators at EU and national level to implement EF-based legislation)
* A.I.S.E. is on right track with the current Charter 2020+ and the planned technical revisions as explained in the technical proposal and to take advantage of the upcoming legislative proposal; however, further alignment will be needed.

The A.I.S.E. Board agreed to take further actions to the points, which were raised by COM. Those focus on consumer faced product comparison/ differentiation, full life-cycle approach, and on ingredients’ assessment (risk-based vs. USETox) ([refer to slides](https://aise.wall.idloom.com/#/filelastversion/14516)). The Advocacy SG has already started to draft an outlined action plan, which will cover key priorities, intelligence gathering, considering also to protect good working relationship with COM. ***ACTIONS:
- SSG to adjust workplans on initiated and potential new technical workstreams and identify help needed.
- ADV SG to prepare full outreach strategy plan, incl. timelines, identify allies, timing and opportunities to elevate political outreach.***

* 1. **PSP Capsules (V. Séjourné)**

V. Séjourné informed the NAC that in the coming days, A.I.S.E. was about to release the updated 2021 of the PSP for capsules. This essentially includes a slightly adapted version of the yellow patch, as well as more specific details regarding use of the mandatory safety message advertising (eg social media). PSP signatories will be asked to re-sign this commitment on that basis and NAC members were asked to also promote it to potential new signatories in their countries when it will be made available.
**ACTION:
- Reach out to potential new PSP signatories, once the revised PSP version is available. (NAC)**

1. FOR INFORMATION

[Refer to pre-readings](https://aise.wall.idloom.com/#/filelastversion/14449)

* 1. Alleged dual quality (D.Hemingway/L.Conti)
	2. CSS: High Level Roundtable (J. Robinson)
	3. CLP Revision: progress update *(*C.Chhuon)
	4. REACH revision: progress update (J. Robinson)
	5. Enzyme sustainability factsheet with AMFEP, ACI, HCPA – global collaboration (G.Sebastio)
	6. UFI Campaign *(V.Séjourné)*
	7. Sleeves / Cleanright *(V.Séjourné)*
	8. Revamp of corporate website *(V.Séjourné)*
	9. A.I.S.E. Forum/Charter Symposium (8 Dec) *(V.Séjourné/S.Nissen)*
1. TOUR DE TABLE AND EMERGING ISSUES AT NATIONAL LEVELS

**From Belgium** (Detic, F.Van Tiggelen):

* On 30 Nov., the 1st meeting of the Belgian **Consumer Dialog** took place.  The Belgian Commissioner, Didier Reynders (**DG JUST**), participated to this event.  He said that it was already the 10th event of this kind.  DETIC was invited to contribute to the event.  We took the opportunity to announce that we are developing an ethical / publicity code for Detergents, just like the one DETIC already has for cosmetic products, since more than 30 years, and which is regular updated.
* Regarding packaging, **refillable packaging** is a topic of interest both for the authorities in charge of PPWD as well for the authorities in charge of CLP and Det Reg.  Companies are invited to launch a project within the context of the Flemish Green Deal “packaged differently”.

From Luxembourg

* End of November, DETIC entered in contact with the LU Ministry for Environment about the future **EPR for wet wipes**.  A first workshop should take place in Q1 2022.  Any suggestion / experience coming from other MS is more than welcome.

**From Denmark** (KoH, H.Fabiansen)

Result of a Danish 3-year research study on professional cleaning and risk of asthma – focusing on cleaning sprays:

The association participated in the steering committee. The results are not controversial, and no media attention is expected.

Many aspects of spray products were investigated in relation to the Danish cleaning sector. This has been collected in a number of recommendations for the cleaning sector:

• Avoid spray application if possible

• Consider other ways of applying the product, particularly pressurized spray cans are problematic

• If spray is used, then spray close into a cloth (1 cm distance)

• Avoid spray products containing strong acid or base, and based on the precautionary principle, quaternary ammonium compounds should also be avoided.

• Substitute unwanted substances – but with well-investigated, non-harmful substances

Three scientific articles have been published. These can be shared if NAC is interested.

**From the Netherlands** (NVZ, H.Razenberg)
Refer to the NVZ Newsletter

**From Romania** (M.Rabu)
 - *Biocides:* National authorities are planning to update the current Order setting the provisions of the national administrative approval. The proposed revisions are including a provision to limit the capacities of packaging (PT 1 – 1 liter, PT 2 – 10 liter) – not transition period mentioned.

- *Explosive Precursors:* The law to set application frame for the actual Regulation is still in the Parliament awaiting approval. The provision of reporting via a physical file (threaded and each page stamped) still kept but till an online reporting would be possible.

1. Next Meeting DateS: [calendar 2022](https://aise.wall.idloom.com/#/filelastversion/14151)

**20 January 2022 : 10h – 13h video call.**

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