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| nac meeting 01/2022 |
| Minutes | Webex Conference callThursday 20 January 202210:00-13:00 CET |

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| Participants TBC: By phoneMr Giuseppe ABELLO, Assocasa Mr Petr BOBROVSKIY, APCoHMMr Bernard CLOETTA, SKW Ms Ana-Maria COURAS, A.I.S.D.P.L.Ms Pilar ESPINA, Adelma Mr Christian GRÜNDLING, FCIOMr Lukas HORAK, CSZVMs Inara JONISKIENE, LikochemaMs Sari KARJOMAA, KHMr Thomas KEISER, I.K.W. Mr Philip MALPASS, U.K.C.P.I.Ms Anna MELVAS, K.T.F.Mr Hallar MEYBAUM, EKTLMs 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 phoneMs 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 ApologiesMs Virginie d’ENFERT, AfiseMs Helle FABIANSEN, KoHBMr Istvan MURANY, Kozmos represented by Barbara Csécsei (as an observer) |

1. welcome & Reminder on competition policy

The rules of the Competition law were reminded, and all agreed to adhere. The Chair, Sari Karjomaa opened the meeting by welcoming the attendees to the web-conference. She welcomed, on behalf of the NAC, Barbara Csécsei representing Kozmos, for this meeting, in place of I. Murany.

1. Short debrief of Board call on 19.1.2022 (S.Zänker)

At the extra-ordinary Board call 3 topics were addressed as following: i) reviewing and discussing the updated proposal of the Finance TF on the viable A.I.S.E. budget ii) short update on the restructuring of the PA & Communications Department and iii) CSS.

1. Financial TF: The Board thanked the TF for the elaboration of a new proposal after the December Board and NAC meeting ([see slides](https://aise.wall.idloom.com/#/filelastversion/14778)) to achieve a viable A.I.S.E. budget that is facing loss income, a legal imposed indexation of salaries (due to inflation) and an agreed increase of temporary work forces to tackle the Green Deal. After in-depth discussion, the Board suggested to further look into the work plan and potential rationalising the work plan, to focus on the 2023 membership fees situation, waiting for the discussion on the 2024 fees at a later stage, and to build on the proposal made to inject from the DetNet reserves a one-time amount of €150K spread over 3 years.

The NAC reviewed the shared slides and was informed that the expected timeframe of the Green Deal and related work is 5 years, while keeping in mind that a new Commission will start to work from end of 2024 onwards. Concerns were raised about the increase in 2023 and subsequent years.

The NAC equally called on:

- prioritisation of the work plan with an overview of the available FTEs. It was mentioned that this does not necessarily lead to less budget needs, as expenses are needed per pillar for meetings, consultants, prints, studies, etc.

- sharing the budget estimations in a more granular work

- organising an additional meeting prior to the Board, to discuss its needs and priorities

- focus on the developments/ membership fees for 2023 only at this stage and review the budget beginning of 2023 to see the needs for a balanced budget in 2024.

*ACTION:*

*- Confirm an extra-ordinary NAC meeting on 9.2*

*Post meeting note*: Next NAC Meeting call confirmed on 9 February at 11:30 to 13:30

1. Update on the restructuring of the PA & Communications Team

N. Viva shortly referred to the mail sent to the Board informing all about the restructuring of the PA & Communication department that led to end of the working contract of V. Séjourné. She praised her excellent contribution to A.I.S.E. for more than 2 decades. In view of the current political agenda and hence the different needs within the association to react in an agile and flexible way and to be focussed on the political priorities, the decision for a change was taken. The discussion started already last year, leading to a restructuring and the creation of a more junior position for that purpose.

H. Razenberg called upon the help of all for not losing the “communication memory” of A.I.S.E. and to ensure that initiatives and contacts will remain available. Due to changes in companies, most of the historical developments are within the associations, and therefore it is important to keep those for future activities, thinking also about the 70th anniversary of A.I.S.E.

1. CSS

With the A.I.S.E. report on the CSS and the economic impact on companies, A.I.S.E. needs to think about the external positioning. M. Mensink (DG Cefic) explained at the December Board meeting that CEFIC is fully behind the Green Deal objectives but calls upon the European Commission to work together to develop an “*EU Chemical Industry Transition Pathway”*. In their press release it is stated “that around one third of this most likely affected portfolio of 28% could potentially be substituted or reformulated.”

Being on the downstream user end, A.I.S.E. needs to assess the impact of the details of the upcoming regulations on its portfolio, on what might be technically and economically feasible. Cefic already identified, that the most significantly impacted downstream sectors are expected to be adhesives and sealants, paints, washing and cleaning products. The changes to Classification, Packaging and Labelling Regulation (CLP) and the application of a Generic Risk Approach (GRA) could potentially affect an entire product category with hardly any alternative.

Consequently, it is of utmost importance to define the A.I.S.E. outreach policy, to be either aligned with CEFIC, calling for a transition pathway, or going deeper in the proposed changes as to CLP and GRA and their principles and to challenge those. Exchanges at associations’ level between Cosmetics Europe and A.I.S.E. have started to encourage high level discussion between both associations for potential alignment. Board companies members were invited to liaise with their respective Board colleagues at CE to foster the dialogue also through companies.

Due to the fact that many NA cover both cosmetics and detergents, the NAC calls also for good coordination, and if possible, alignment in the outreach messages.

1. APPROVAL OF agenda

The agenda was approved.

1. approval of MINUTES & REVIEW OF ACTIONS OF LAST MEETING

The [Minutes](https://aise.wall.idloom.com/#/filelastversion/14690) from the last meeting were approved (as per version file on A.I.S.E. extranet). All actions were covered through the agenda. One action from the last meeting is in the process of being undertaken, namely, to investigate with the NAC the interest for a training on Biocidal Product Families.

1. key topics to be discussed
	1. **Green Deal**
		1. **CSS:** A.I.S.E. CSS economic impact assessment status and next steps *(J. Robinson)*

The draft report is in the process of finalisation, and an advocacy and communication plan is being devised. A.I.S.E. is following learnings from Cefic’s process, but is also in regular contact with IFRA and Cosmetics Europe to coordinate.
NAC members confirmed that this is receiving high attention in meetings between associations, e.g. in Italy. It was clarified that the report will constitute a statistically representative analysis for the detergents and maintenance sector in Europe as a whole, but the same cannot be provided for SMEs as the sample size is too small and so the report will include only indicative remarks on the impact for SMEs. Similarly the available data do not support differentiation between countries.

Downstream user messaging will be very important, for the generic approach to risk management in particular (hazard vs. risk). The launch of the report may be before the March NAC meeting, so NAC members asked if there would be other meetings/opportunities at which they would be consulted. D. Hemingway advised that a sub-group is foreseen for the advocacy and communication plan, which is likely to require the involvement of some NAC members.

The consultation for the separate MAF report will open in early February, and NAC members were asked to encourage members once again to respond. The list of participating member companies will be re-shared with the NAC members.

In closing, J. Robinson shared the news that the [open public consultation](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12959-Chemicals-legislation-revision-of-REACH-Regulation-to-help-achieve-a-toxic-free-environment/public-consultation_en) on the revision of REACH had just opened that morning.

* + 1. **Activities on CEAP** *(S.Nissen)*

Following the meeting on 30 November 2021 with Emmanuele Maire, Head of unit DG ENV Sustainable Production, Products and Consumption, and her team (see [minutes](https://aise.wall.idloom.com/#/filelastversion/14690) of last meeting for outcome and main leanings), the A.I.S.E. Board had agreed to take further actions to the points, which were raised by the Commission. Those focus on consumer faced product comparison/ differentiation, full life-cycle approach, and on ingredients’ assessment (risk-based vs. USEtox). The SSG has started to adjust workplans on initiated and potential new technical workstreams and identify help needed (see slides for details). In parallel, the Advocacy SG is preparing a full outreach strategy plan, incl. timelines, identify allies, timing, and opportunities to elevate political outreach.
In this context, S. Nissen mentioned also that promotion activities at local level should be aligned with those advocacy activities, also referring to the German governmental ‘[Siegelklarheit](https://www.siegelklarheit.de/siegelverzeichnis%22%20%5Cl%20%22/wasch-reinigungsmittel;sort:rating_desc)’ initiative (a platform that provides consumers with information on credible labels to help them with their sustainable purchase decision) as good example; this has recently been updated and continues to officially recognise the Charter as ‘Good choice’.

* 1. **General revision of the Detergents Regulation High level update** (G.Sebastio)
		1. **Risk of a ban on phosphorus-based compounds in professional and industrial applications**              *(A. O’Kane)*

The NAC was updated on the work underway since the working session between A.I.S.E. and the Commission on 9.11.21 on the Detergent Reg. review, at which the Commission asked for more information on the use of phosphorus in professional cleaning products. A.I.S.E. set up an ad hoc working group to answer the COM’s request for information on the current P market, economically viable alternatives and critical uses. The group distributed a survey to the membership on 14.12.21 - the deadline has been extended 21.01.22. Feedback will then be analysed, and a response prepared to share with the COM with the help of the WG. Today, it is estimated that 96 companies have provided input, which is very positive, with substantial comments to illustrate the consequences of restrictions, and several proposals for limitations that would be manageable/acceptable. The market share that the survey represents will be clearer once all feedback is considered.

* On the consequences of restructuring P, the need for reformulation and higher costs come out as the two biggest issues facing our sector, specifically for phosphoric acid and HEDP.
* On the consequences of replacing P with alternatives, there is not only an economic impact (i.e. higher cost), but also implications for sustainability (e.g. need for higher dosage) with certain alternatives
* On the question whether our sector could adhere to the limits proposed by the Norwegian authorities, the responses are clear that 5/6 limits are too low, and 3 of these particularly unacceptable for us – 0.2% for liquid cleaning agents and washing up liquids, 2.5% for cleaning agents in powder form, and 2.5% for special cleaning of milk production and other industries. Numerous comments will enable us to build a good narrative to defend our position.

Efforts to get support from other industries for our position are being considered: Thomas Rauch has been in touch with a German WWTP who have said that the replacement of inorganic (P) with organic alternatives will cause issues for waste water treatment.

It was also raised that in some member states, local action is taken to reduce release into waste water. An example was shared for boat cleaning in Finland.

Aside from the P restriction, A.I.S.E. has been working on other topics to prepare for the Detergent Regulation revision consultation. The following additional points were raised:

***Key timings:***

* 15 December – COM Detergent WG
* COM has identified key issues to assess in the revision of the Detergent Regulation
* Consultation expected – February (?) to collect data to quantify the issues
* Following this, Commission will assess policy options to correct the identified problems.
* Another meeting of the Detergent WG will take place in 1ST HALF 2022/ Q2 2022
	+ 1. **Refill and bulk sale**

A.I.S.E. is working to revamp the guidance. There were some discrepancies in positions especially on the definition of bulk sales, and responsibilities of stakeholders. Following two rounds of comments, a new proposal is made that also aligns the definition of bulk sale to the CLP bulk sales discussions at CARACAL.
On 21 January between 10:00 - 11:30 – there will be one last opportunity for input. Secretariat stressed the importance of finalizing the guidance, and asked NAC to ensure there is adequate representation at the CLP WG meeting to finalize this work.
If no consensus can be achieved, the guidance will be moved forward with only written comments.

* + 1. **Microbial Cleaning Products:**

A.I.S.E. is working on guidance on this point in a subgroup of experts and is also aligning with the microbial cleaning product TF within the American Cleaning Institute (ACI) on this topic. Primary focus is to address safety of these products.
Separate discussion on how this fits in the overall Detergent Regulation strategy - to take place at the Advocacy SG meeting 26th January

* + 1. **Labelling of fragrance allergens:**

The proposal of the Cosmetics Regulation to expand the fragrance allergen list 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. ***This means, once the amendment to the Cosmetics Regulation enters into force, the timing will be: 3 years for placing on the market and 5 years for product withdrawal.*** A.I.S.E. is following this topic closely, while in parallel work is ongoing for digitalisation.

* + 1. **Labelling of preservatives:**

A quick update was given on the preservatives. Member States have until 28 February to comment on the A.I.S.E. proposal and the A.I.S.E. Detergent WG is preparing comments and will ask for support of the NAC on this topic (25 January).
It was also shared that as part of the work on digitalisation, A.I.S.E. is organising an exchange with IVDK (Informationsbund Dermatologischer Kliniken) to present our work on labelling. As part of this A.I.S.E. will share the preservative labelling proposal and ask IVDK to comment with regards to how it is protective of consumer health.
It is clear that Member States do not understand why this is an issue for industry and want all carry over preservatives to be labelled. The NAC will engage on this topic, some members will approach their authorities with SME representatives to better explain why this is an issue for industry.

* 1. **Microplastics** (J. Robinson)
		1. **Restriction on intentionally-added microplastics**

The status was presented (see [slides](https://aise.wall.idloom.com/#/filelastversion/14777)). The ongoing delay at the Commission is thought to be attributable to the dossier having become very political and elevated to higher levels. NAC members agreed to share any intelligence they may receive.

* + 1. **Measures to reduce unintentional releases – COM study and public consultation**

No discussion; see information in presentation slides.

1. Priorities for the NAC in 2022 – 2023
The discussion was rather short as discussed already earlier on the agenda (2.i). It agreed to organise an extra-ordinary NAC Meeting on 9 February to assess the priorities for the National Associations for the work plan 2022-2023, taking also the available FTE and the budget implications of the activities into account. See also ACTION under 2.i)
2. FOR INFORMATION ONLY

See pre-reading/ [annotated agenda](https://aise.wall.idloom.com/#/filelastversion/14703)

* 1. Advocacy (D.Hemingway)
		1. Advocacy SG Working Methods
		2. Member State/NAC Outreach
	2. Enzymes (Phil Davison)
		1. A.I.S.E./ACI/HCPA collaboration on creating global enzyme safe handling guidance
		2. Enzyme Working Group: update
	3. Green Deal / CSS (J. Robinson)
		1. High Level Roundtable
		2. Revision of CLP and REACH
	4. Biocides update (E.Cazelle)
1. AOB

The NAC was informed about the report of the Lithuanian Association about their activities in H2 2021, which can be read [here](https://aise.wall.idloom.com/#/filelastversion/14734) .

1. Next Meeting DateS

The NAC recommended to have the March meeting in a virtual format. A.I.S.E. will inquire with the members of both NAC and MC around Mid February.

 *ACTION:*

*- Inquire with NAC and MC about their travel policies for the March meeting (A.I.S.E.)*

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| Wednesday 7 February 2022 (extra-call) | 11h30 – 13h30 | Virtual conference call |
| Tuesday 22 March 2022 ***(joint lunch & meeting with MC)*** | 13:30 -16:30 | Brussels (A.I.S.E.) TBC end Feb |
| Wednesday 23 March 2022 (+ lunch) | 09:00-15:00  | Brussels (A.I.S.E.) TBC end Feb |
| Monday 13 June 2022 | 9:00-13:00 or PM | Brussels (GA AISE on 14 June) |
| Thursday 15 September 2022  | 14:30 – 17:30 | Madrid, Spain tbc  |
| Friday 16 September 2022: webinar + lunch | 10:30-12:30  | from Madrid, Spain tbc |
| Thursday 8 December 2022 | 09-12:00 | Brussels (A.I.S.E) |

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