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| National associations COMMITTEE meeting 04/2022 | |
| Minutes | Webconference Monday 13 June 2022 10:30 – 16:30 CET |

Participants

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| By phone  Mr Giuseppe ABELLO, Assocasa  Ms Blaženka Ćiško Anić, Saponia  Mr Petr BOBROVSKY, APCoHM  Mr Bernard CLOETTA, SKW *(partly)*  Ms Ana-Maria COURAS, A.I.S.D.P.L.  Ms Virginie d’ENFERT, FHER  Ms Pilar ESPINA, Adelma  Ms Helle FABIANSEN, KoHB *(partly)*  Mr Christian GRÜNDLING, FCIO  Mr Olof HOLMER, KOHF  Ms Inara JONISKIENE, Likochema  Ms Sari KARJOMAA, KH *(Chair)*  Mr Thomas KEISER, I.K.W.  Mr Philip MALPASS, U.K.C.P.I.  Ms Anna MELVAS, KTF  Ms Anna OBORSKA, P.A.C.D.I.*(partly)*  Ms Tulin OZKOCA, KTSD  Ms Jelena PEJCINOVIC, Kozmodet  Ms Mihaela RABU, Rucodem  Mr Finn RASMUSSEN, V.L.F.  Mr Hans RAZENBERG, N.V.Z.(vice chair)  Ms Marijana Sabljić, Saponia  Mr Roman STERBAK, S.Z.Z.V.  Ms Françoise VAN TIGGELEN, Detic *(partly)* | From A.I.S.E. (by phone):  Ms Cindy CHHUON  Ms Bahar KOYUNCU  Mr Luca CONTI  Ms Elodie CAZELLE  Mr Dave HEMINGWAY  Mr Jacopo MONALDI  Mr Sascha NISSEN  Ms Aisling O’KANE  Ms Jan ROBINSON  Ms Giulia SEBASTIO  Ms Amelie WEBER  Ms Susanne ZÄNKER |

1. Welcome and Reminder on competition policy

The meeting was opened by the Chair, S. Karjomaa, who welcomed the participants to the Webex. She also welcomed two new A.I.S.E. colleagues, namely Bahar Koyuncu, who started in January, covering topics such as ESPR and SSbD etc. and also Jacopo Monaldi who started in May taking over the topics from Giulia, i.e., Detergents Regulation, etc.

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

1. approval of agenda

The agenda was approved.

1. APPROVAL OF MINUTES & REVIEW OF ACTIONS OF LAST MEETINGs ([23 march](https://aise.wall.idloom.com/#/filelastversion/16005) and [joInt MC/NAC 22 march](https://aise.wall.idloom.com/#/filelastversion/15941))

The Minutes from the joint meeting with the MC to review the work programme on 22 March 2022 were approved.

The meeting minutes of the NAC meeting of 23 March 2022 were approved.

1. GOVERNANCE *(10:45 – 11:00)*
   1. **Short debrief of last Board meeting** (28 April 2022) – Refer to [minutes](https://aise.wall.idloom.com/#/filelastversion/16256)

In addition to the points covered through the agenda, reference was made to the following points:

* Well-being audit among the A.I.S.E. staff (and former staff): very positive outcome and work on the suggested improvement areas is engaged with the team.
* Finances: in order to remain financially sustainable, the Financial TF will take up again its work in autumn to come up with a proposal for the Board in spring 2023. H. Razenberg and H. Fabiansen volunteered to participate from the NAC.
* A.I.S.E. work programme 2022 – 2023 was approved by the Board.

For the other points see below or the Board minutes.

* 1. **General Assembly:**

Confirmation of candidate for the A.I.S.E. Vice president position from the NAC *(L.Conti)*

NAC approved the nomination of Hans Razenberg (NVZ – Netherlands) as NAC A.I.S.E. Board Vice-President for the mandate 2022 – 2024.

* + 1. NAC Chair and Vice Chair *(L.Conti)*
       1. *Nomination of NAC Chair*

NAC approved the nomination of Sari Karjomaa (KH – Finland) as NAC Chair for the mandate 2022– 2024.

* + - 1. *Nomination of NAC Vice-Chair*

NAC approved the nomination of Hans Razenberg (NVZ – Netherlands) as NAC Vice-Chair for the mandate 2022 – 2024.

* + 1. Last questions linked to the agenda (S.Zänker)

The NAC had no further question in relation to the GA agenda or documents that were circulated ahead of the GA.

1. EUROPEAN GREEN DEAL *(11.00 – 12.30)*
   1. **Circular Economy Action Plan** (S.Nissen, *B.Koyuncu, A. Weber*)
      1. Regulation on Ecodesign requirements for sustainable products (ESPR)

B.Koyuncu provided a presentation on Commission Proposal for Ecodesign Regulation on Sustainable Products (ESPR). Key articles and relevant aspects and action plan were covered. NAC members can provide their inputs to the proposed action plan by A.I.S.E. Secretariat by notifying B.Koyuncu.  
H. Razenberg emphasized that detergents being indicated in the proposal as high environmental impact and potential for improvement is not adequately supported by the Commission and references made to studies are done by the US for detergents that use phosphates. S. Nissen confirmed that the authorities are potentially referring to outdated information even before compaction and that the exact product groups being referenced within the “Detergents” need to be also clarified. It was agreed to capture this as one of the potential questions for the webinar with the Commission and topics for engagement.  
V. d’Enfert highlighted that there is a ban in place for destruction of unsold goods in France, and the products are given away to NGOs and associations. H. Razerberg made a point that there is a false perception that there is over production, which is not the case for detergents.  
M. Rabu asked how DPPs are expected to be implemented. B.Koyuncu responded that the requirements will be defined by the Commission, whilst it will up to the market and innovation to have the DPP tools. L. Conti also informed that the DPPs will be required only for product categories for which there are delegated acts. C. Grundling shared that batteries will be the first product category for which DPPs will be implemented and that as A.I.S.E. we can also learn from their experience.

* + 1. Directive on empowering consumers for the green transition

An update was provided on the proposed Directive on Empowering Consumers for the Green Transition and the meeting with DG JUST on 02 June ([see slides](https://aise.wall.idloom.com/#/filelastversion/16562) for details). Based on the feedback from DG JUST, it was suggested to the NAC to support the proposal’s wording on sustainability labels towards local authorities. A more detailed assessment will be developed after September.

* + 1. Addressing CEAP objectives - Next Charter revision

S. Nissen informed the NAC that following SSG and MC proposal, the Board agreed to involve an experienced sustainability consultancy for technical and LCA project management to run successfully and on time the activities as identified in the Charter revision workplan. A pre-selection of consultancies had been carried out by the SSG, based on a technical assessment. A request for proposals was prepared by the SSG and has now been sent to shortlisted consultancies, including a clear briefing and definition on expectations ([see slides](https://aise.wall.idloom.com/#/filelastversion/16563) for details). Depending on the content and quality of proposals, S Nissen confirmed the option to work with more than one consultancy.

In this context the NAC was also informed that the COM legislative proposal on green claims’ substantiation is now expected for end of the year, after the Regulatory Scrutiny Board (an independent body within the Commission that advises the College of Commissioners) rejected the DG ENV proposed impact assessment.

* + 1. Revision of the Packaging and Packaging Waste Directive (*A.Weber)*

An update was provided on recent A.I.S.E. activities on the Packaging and Packaging Waste Directive Review ([see slides](https://aise.wall.idloom.com/#/filelastversion/16564)).

* + 1. Perforated sleeves & EPBP: consumer removal of sleeves (*A.Weber)*

An update was provided on the European PET Bottle Platform’s (EPBP’s) interim endorsement for perforated full body sleeves for home (and personal) care PET bottles ([see slides](https://aise.wall.idloom.com/#/filelastversion/16565)). As part of the extension of the endorsement until January 2023, EPBP highlighted that at this stage data on removal of sleeves by consumers, based on numbers from Producer Responsibility Organisations (PROs), is most important. A.I.S.E. has been in contact with Fost Plus (Belgium) and CITEO (France) on this topic, and the NAC was asked about the possibility for cooperation on data collection on sleeve removal with PROs from further MS, preferably from Southern Europe. Ana-Maria Couras offered to establish contact with the Portuguese PRO on the topic. The NAC highlighted that a document summarising the advantages of full-body sleeves would be of help.

* 1. **PC&H CEAP TF:** Inventory of national requirements for labelling, packaging and waste management for the professional sector (*A.O’Kane, A.Weber)*

The NA inventory and its background, shared with the NAC via mail on 19 May, were presented ([see document](https://aise.wall.idloom.com/#/filelastversion/16566)). Input has been received from one NA to date. The NAC expressed hesitancy to create such an overview (membership of PC&H companies in some NAs has fallen in recent years). Waste management is a very national issue, and individual national associations are at the disposal of their direct members to provide this information. The NAC underlined the importance of clarifying further if and how the inventory will be used for advocacy purposes at European level as a next step. Due to the complexity and the ongoing evolution of these topics at national level, any inventory provides only a snapshot in time.

***ACTION:  
- A. O’Kane and A. Weber to bring feedback to the PC&H CEAP TF and discuss the next steps and report back to the NAC.***

* 1. **Chemicals Strategy for Sustainability** (D.Hemingway, J.Robinson)
     1. A.I.S.E. outreach programme and material for NA engagement

The NAC was updated on the development of of the outreach programme and reminded that the draft presentation on the Ricardo economic analysis results is open for their comments until Friday 17 June.

* + 1. Revision of REACH: update on workstreams

The NAC was updated on the status of the key legislative revisions ([see slides](https://aise.wall.idloom.com/#/filelastversion/16567) for details). The enforceability of generic restrictions - particularly to prevent non-compliant imports from outside the EU – will be an important issue, and is already being raised by some NAC members with their competent authorities.  
It was noted that the concept of ‘substances of concern’ is referenced in ESPR as well as in CSS and other chemicals legislation. Most initiatives under CEAP and chemicals policy are interlinked to some extent, but a coherent holistic picture is still missing to date.

LUNCH BREAk *(12.30 – 13.15)*

1. Key topics for discussion *(13:15 – 13:45)*
   1. **Detergents Regulation** (J.Monaldi)

The NAC was updated with a [presentation](https://aise.wall.idloom.com/#/filelastversion/16568) on the work of the secretariat on the revision of the Detergent Regulation. In particular, the discussion focused on the main priority topics: microbial cleaning products, soluble films (polyvinyl alcohol, PVOH), and fragrance allergens. It was decided to involve all NAC members in the discussion of naming proposals for labelling MBCPs. The new A.I.S.E. proposals include the removal of the link with Annex III of the Cosmetic Regulation. The NAC supported the proposal. The DETREG WG is working jointly with the Advocacy SG to define a list of suggested regulatory actions for every point discussed during the consultations, for internal use (and to be shared with DG GROW, when needed).

* 1. **REACH restriction proposal on intentionally-added microplastics** (J.Robinson)  
      (if draft text for REACH Committee available)

As there was no news on a draft from the Commission when the NAC took place, the point was not discussed. (REACH Committee meeting scheduled for 21-22 June)  
NAC members are encouraged to share any document or information that they may obtain.

* 1. **JRC study Alleged Dual Quality detergents:** Member States participation(L.Conti)

NAC Members updated on the situation at national level about those Member States participating to JRC collection of information on products in the list. At this stage, NAC members have little information on Member States participating.

1. COMMUNICATION AND PUBLIC AFFAIRS *(13:45 – 14:45)*
2. ToUR DE TABLE AND EMERGING ISSUES AT NATIONAL LEVELS *(14:45-15:20)*

The President of A.I.S.E., Nadia Viva, was welcomed for this Tour de Table.

**From France (FHER):**

Packaging: during last meeting, it was reported that Detic signed on 11/3 a Green Deal entitled “Differently Packaged” with the Flemish authorities.  This Flemish Green Deal is aiming at encouraging bulk sales and use of refillable packaging.  Detic is engaged for both cosmetic products and detergents & maintenance products.  Recently Detic came also in contact with the Walloon government in view to sign an “Environmental Transition Agreement on waste prevention, with the retail sector”.  The scope of this future agreement is rather similar to the one of the Flemish Green Deal.  
This illustrates even further that the reduction of packaging remains a hot topic in Belgium, despite the fact that Belgian law requires companies to prepare a Packaging Prevention Plan every three years, since the 90’s, when they place on the BE market packaging above given threshold.  
Last year, Detic started working on a Detergents Publicity Code (similar to the one we have for cosmetics since 1978).  This Code is now reaching the point of adoption, internally by Detic members as well as externally by Belgian SROA (Self-Regulatory Organisation on Advertisement).  To be noted: the content of this voluntary ethical Code is in line with the new mindset that revision of UCPD is expected to promote as well as expected outcome of Green Claims substantiation and recommendations against green washing.

**From Finland:**

• Professional cleaning and hygiene sector: KH prepares to publish a communication on the impact of the war in Ukraine on the PCH sector. The communication would include comments on the increased energy prices and disruptions in material flows, and their impact on the costs and availability of end-products. The aim is to support KH's member companies in answering to their customers' questions and trying to act in the best possible way in the midst of a crisis.

• National EPR scheme for wet wipes: A national Producer Responsibility Organisation will most probably be established for wet wipes to fulfil the requirements of the SUP Directive by the end of 2024. This is not an issue for all members, but a big issue for those involved. KH is cooperating with the Ministry of the Environment and the Finnish Commerce Federation and with some other stakeholders to find the most workable solution.

**From the Netherlands (NVZ):**

Refer to NVZ Newsletter June, it was referred to “Misleading Marketing Claims” and the Dutch initiative on ESPR expressing their question about the reason for Detergent to be mentioned for inclusion into the revised scope.

1. WRITTEN INFORMATION IN THE annotated agenda
   1. **Biocides**

See [pre-reads](https://aise.wall.idloom.com/#/filelastversion/16514)**.** (E. Cazelle)

1. Next Meeting DateS and close of the meeting

The meeting was closed at 15h30.

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| Thursday 15 September 2022  Friday 16 September 2022 | Lunch (jointly with CE) + 15:15 – 18:00  9:00 – 13:00 + Lunch | Madrid, Spain |
| Thursday 8 December 2022 | 09:00-13:00 | Brussels (A.I.S.E.) |

1. ACTIONs

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| ***What*** | ***who*** | ***when*** |
| **5.2. PC&H: bring feedback to the PC&H CEAP TF and discuss the next steps and report back to the NAC.** | **AOK - AW** | **By 15/09/22** |

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