|  |  |
| --- | --- |
| national associations COMMITTEE meeting 05/2022 | |
| Minutes | **Hotel Urso&Spa**, Madrid  **Thursday 15 Sept. 2022** (15:15 – 17:50) **Friday 16 Sept. 2022** (09:00-13:00 followed by lunch) |

**Participants**

|  |  |
| --- | --- |
| Mr Giuseppe ABELLO, Assocasa  Ms Ana-Maria COURAS, A.I.S.D.P.L.  Ms Virginie d’ENFERT, FHER *(15th only)*  Ms Pilar ESPINA, Adelma  Ms Helle FABIANSEN, KoHB  Mr Christian GRÜNDLING, FCIO  Ms Michaela HLAVICOVA‘, Czech Branded Association  Ms Inara JONISKIENE, Likochema  Ms Sari KARJOMAA, KH *(Chair)*  Mr Thomas KEISER, I.K.W.  Mr Istvan MURANYI, KOZMOS  Ms Anna OBORSKA, P.A.C.D.I. *(15th only)*  Ms Jelena PEJCINOVIC, Kozmodet  Ms Mihaela RABU, Rucodem  Mr Finn RASMUSSEN, V.L.F.  Mr Hans RAZENBERG, N.V.Z*.(Vice-Chair)*  Mr Roman STERBAK, S.Z.Z.V.  Ms Françoise VAN TIGGELEN, Detic | From A.I.S.E.  Mr Dave HEMINGWAY  Mr Sascha NISSEN  Ms Jan ROBINSON  Ms Susanne ZÄNKER  Apologies  Mr Bernard CLOETTA, SKW  Mr Olof HOLMER, KOHF  Mr Philip MALPASS, U.K.C.P.I. (*proxi to S. Karjomaa)*  Ms Anna MELVAS, KTF  Ms Marijana Sabljić, Saponia  Ms Virginie d’ENFERT, FHER *(16th)*  Ms Anna OBORSKA, P.A.C.D.I. *(16th)* |

**Thursday 15 September 2022**

1. **WELCOME AND Reminder on competition policy**

S. Karjomaa opened the meeting by welcoming the attendees and conveying the apologies. She warmly thanked P. Espina for her great hospitality to organise the NAC meeting in Madrid, as actually already planned in 2020, but not possible due to COVID.

S. Zänker added, that the A.I.S.E. President sent her best regards and wishes for the meeting, which she could not attend due to a business trip to the US.

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

1. **approval of agenda**

The agenda was approved.

1. **APPROVAL OF** [**MINUTES**](https://aise.wall.idloom.com/#/filelastversion/18813) **& REVIEW OF ACTIONS OF LAST MEETING (13 June 22)**

The Minutes of the last meeting were approved. An update of the action from the last meeting is provided in the prereading under 9.2, related to the PC&H sector and CEAP.

1. **Key topics**
   1. **Chemicals Strategy for Sustainability (CSS)**
      1. Detergents Regulation

NAC members were updated on the status of the revision of the Regulation (see [slides](https://aise.wall.idloom.com/#/filelastversion/19144)). DG GROW submitted its impact assessment this week to the Regulatory Scrutiny Board (RSB), and A.I.S.E. has provided significant input both formally and informally.

The Microbial Cleaning Products TF is working in conjunction with ACI, which has hired a contractor, to develop a risk assessment method and guidance document (timeline: end 2022). The aim is to fulfil the Commission’s needs, who do not consider communication requirements alone to be sufficient. A.I.S.E.’s current position is to advocate for online listing requirements, and no position is being taken on any specific product label wording.

It was noted that guidance has existed in the Netherlands for several years, developed through collaboration with the labour inspectorate. Inclusion of additional enzymes by some producers triggers labelling requirements irrespective of the microbial content.

* + 1. CLP

Contrary to what was stated in good faith in the annotated agenda, the delegated act introducing the new hazard classes has undergone a fast-track inter-service consultation within the Commission and is due to be published imminently for a four-week public consultation. NAC members noted that Member States could modify Annex I by tabling additional amendments during the Ordinary Legislative Procedure on the main CLP revision (expected to be adopted on 26 October), but this would be a major undertaking. Cefic will react to the delegated act through the WTO TBT notification; A.I.S.E. will act mainly in collaboration with DUCC.

Some NAC members stressed the importance of advocacy on differentiated transition periods, for substances vs. mixtures but more importantly for first placing on the market vs. subsequent supply (*note:* addressed in previous A.I.S.E. positions, available [here](https://aise.wall.idloom.com/#/group/763/files/structure/3051)). A caveat was noted that this could result in shorter deadlines for A.I.S.E. members as the original formulators, as well as the risk of activating enforcement authorities to become stricter on compliance.

* + 1. REACH
       1. *GRA*

NAC members were updated on the discussions of advocacy options (see pre-read) and were invited to help complete the mapping of Member State views on the GRA. A.I.S.E. is developing a narrative for NAC members to use in national outreach, and there is also a set of common DUCC talking points which will be shared when ready. NAC members are encouraged to share ideas, arguments, and examples with the A.I.S.E. secretariat, with each other and also with colleagues in national associations of other sectors.  
***ACTIONS:  
- Share intelligence on MS positions on GRA with A.I.S.E. secretariat (NAC members)  
- Provide A.I.S.E. and DUCC material for use by NAC members (Secretariat)***

* + - 1. *Restriction proposal on intentionally added microplastics*.

NAC was informed about the Microplastics TF’s assessment of the draft restriction (see [slides](https://aise.wall.idloom.com/#/filelastversion/19146)) and encouraged to share any intelligence on the position of their MS competent authority/ies. NAC members commented that further guidance will be needed on interpretation of paragraph 5 (partial derogations for microplastics contained by technical means, permanently modified or permanently incorporated into a matrix) and of ‘industrial sites’ as per paragraph 4(a), since there is no definition in REACH (*note:* guidance on differentiation between industrial and professional uses is currently provided by in [ECHA document R.12 on use description](https://echa.europa.eu/documents/10162/17224/information_requirements_r12_en.pdf/ea8fa5a6-6ba1-47f4-9e47-c7216e180197?t=1449153827710), Appendix R.12.3). It was noted also that a lot of work lies ahead on the reporting obligations; last year ECHA was unwilling to engage until given a mandate to develop the system required.

***ACTIONS:  
- Share any information on Member States positions on microplastics restriction proposal with A.I.S.E. secretariat (NAC members)  
- Develop advice and guidance for members in Microplastics TF (Secretariat)***

* 1. **Circular Economy Action Plan (CEAP)**
     1. ESPR

The NAC was updated regarding on-going activities on ESPR and the proposed amendments. An overview of next steps was shared. In this context the NAC was reminded that the current legislative proposal is a horizontal framework, which will be completed via delegated acts for specific product categories at a later stage. Recently, the JRC confirmed to A.I.S.E. in a written note that there is the intention to publish a 1st work programme with selected product categories at the end of this year, and in case detergents would be covered, A.I.S.E. would be invited to get involved.  
NAC members were asked to engage with national authorities – when they have the opportunity – to share A.I.S.E.’s position and amendments as well as get updated on intelligence and developments on the dossier at national level.  
There was some discussion on the chapter concerning unsold consumer goods, and it was confirmed by NAC members that the local legal frameworks differ from each other, e.g. whereas in Portugal unsold consumer goods are treated as waste, in France detergents are not and must not be destroyed, but reused, donated, etc. H Razenberg informed the NAC that recently, NVZ has shared its position on the topic with local authorities.

* + 1. Update on Empowering Consumers Proposal (UCPD)

NAC members were updated on this topic. During a meeting, DG JUST confirmed that the Charter fulfils the principles of the proposal, therefore A.I.S.E. is supporting the proposed text on sustainability labels and is not planning to pro-actively table amendments. In addition, A.I.S.E. may potentially “join forces” with more horizontal associations such as AIM. No involvement from the NAC is needed on the file at this stage. A.I.S.E. will continue monitoring the file with a focus on the Charter.

NAC members asked the A.I.S.E. team to check with AIM:

* to which extent rating apps are covered, also with regard to proposed amendments;
* whether and how company names will be treated in the proposal, and whether AIM is looking into this.

***ACTION:  
- Check with AIM accordingly on rating apps and company names (A.I.S.E. secretariat).***

* + 1. Addressing the CEAP objectives
       1. *Elevating the Charter*
       2. *Involvement of consultancy for project management*

The NAC members were updated on the activities as identified in the Charter revision workplan. The Board had 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. During summer, three consultancies have replied to a request for proposals, which had been prepared by the SSG. The SSG initiated an assessment process, and due to the good quality of the received proposals, follow-up calls with each of the three consultancies were organised. Aim is to finalise the selection procedure by mid-approval (i.e. via Board endorsement on 11 October).

The NAC appreciated the update and proposed to investigate in different options for the funding, involving all Charter members – incl. retailers and distributors – as those benefit also from the Charter. On the other side, the strategic nature of such a Charter revision for the whole industry was confirmed, justifying also funding from the A.I.S.E. central budget and reserves.

In this context, attention was brought to the point on the involvement of smaller companies, e.g. inform them in due time on activities linked to the Charter revision to gain their input. The NAC also agreed on the active role of national associations to promote the Charter at local level, both within the industry network as well as to relevant stakeholders – with the latter trying to get the Charter even further officially recognised by local authorities. To this regard, it was agreed to consolidate and simplify our communications material and organise a workshop with the national associations. The NAC asked for ideas for such a workshop, striving to have it organised in autumn this year.  
***ACTION:  
- Prepare options for funding structure, involving contributions from all Charter members and the A.I.S.E. network via central budget and reserves for Board approval on 11 Oct (A.I.S.E. secretariat/SSG).  
- Prepare ideas for workshop with NAC members and bring back to NAC, so that workshop can be organised in autumn (A.I.S.E. secretariat/SSG)***

1. **ToUR DE TABLE AND EMERGING ISSUES AT NATIONAL LEVELS**

**From Belgium (F.Van Tiggelen)**

Biocides: Detic is advocating towards BE CA and inspection on the issue of too short transition periods in BPR, especially for seasonal products such as insecticides or swimming pool products.

**From Denmark (H. Fabiansen):**

*The Danish Consumer Council* broadens the scope of the app *Kemiluppen* to include detergents:   
With a four-year grant on the National Budget, The Danish Consumer Council has decided to broaden the scope of their app, *Kemiluppen* to include detergents in addition to cosmetic and personal care products. Therefore, products from various categories of washing and cleaning detergents are selected for a declaration test based on the mandatory product data sheet. Most recent declaration tests include [all-purpose cleaners](https://eur05.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftaenk.dk%2Ftest%2Fkemitest-universalrengoering&data=05%7C01%7Ccaroline.dubois%40aise.eu%7Cce4b8dd5a498469122b408da8ffeced0%7Cf2bb4852857f4cca9093cea799bf1c11%7C1%7C0%7C637980621793692323%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=RpxwtdpLHKO9T9Z6%2Ftw1miipTxXLXMxfN0XcS2Xa0yQ%3D&reserved=0) and [cleaning wipes](https://eur05.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftaenk.dk%2Ftest%2Fkemitest-rengoeringsservietter&data=05%7C01%7Ccaroline.dubois%40aise.eu%7Cce4b8dd5a498469122b408da8ffeced0%7Cf2bb4852857f4cca9093cea799bf1c11%7C1%7C0%7C637980621793848549%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=ZNcUVcaUaf5wPQnro66psnATpw7JWGpix52MyeX9%2BXA%3D&reserved=0). With the new feature incorporated in the app, consumers will be able to scan detergents and receive a ranking A, B or C based on ingredients and their properties as “unwanted substances”. We expect the new feature to be implemented end 2022.

**From the Netherlands (H.Razenberg)**

Refer to NVZ International Newsletter

**From Romania (M.Rabu)**

-Detergents: the Consumers Authority is maintaining its approach on labeling that all text in foreign language/s has to be in Romanian too; claims such as "biodegradable" should not be used if it is regulated by legislation.    
-Biocides: Consumers Authority approach on claims "kills 99.9% germs" is that such "pleonastic statements" should not be made (when it is obvious that a certain formula automatically offers a certain benefit).

**From Spain (P. Espina)**

The Spanish Consumer Ministry has launched a public consultation on the labelling in the Braille alphabet to guarantee universal accessibility to goods and consumer products of special relevance. ADELMA sent its position to that competitive authority.  
This topic can be a point of attention in case other member states could decide to follow similar practices.

Biocides: ADELMA has presented the corresponding amendments to the public consultation regarding the creation by the Competent Authorities of a new State Public Health Agency and where the taxes for these products will be also increased (there is a new tax on the helpdesk service - if a company asks a question about its dossier, it will be charged for the answer)

**friday 16 September 2022**

1. **COMMUNICATION AND PUBLIC AFFAIRS** 
   1. **General Approach**

In addition to the items included in the agenda, NAC were informed about the new general approach to communications. A.I.S.E. has a large volume of communications material but needs updating to reflect the new audiences that A.I.S.E. will be trying to reach during this phase of the legislative process.

A.I.S.E. will be consolidating and simplifying our communications material to make it more accessible to a wider, more general audience. As part of this process messages will be consolidate under three main areas: Charter for Sustainable Cleaning, Safe & Sustainable Use Information, and Professional Cleaning & Hygiene.

* 1. **Website Revamp**

NAC received an update on the website revamp and were informed about the ambitious accelerated timetable for completion.

* 1. **Activity & Sustainability Report**

NAC were informed that the Activity Sustainability Report would soon be ready, and NAC would be contacted to see how many copies they would need. The report was delayed mainly due to include the latest KPI data that had been delayed by additional due diligence procedures/checks.

* 1. **Forum and 70th Anniversary**

NAC were informed that plans for the Forum and Anniversary were ongoing and that contingency plans were in place in case of travel restrictions.

* 1. **Maximising NAC expertise & network**

The diversity of our association is one of its greatest strengths and over the coming months/years we will need to utilise that diversity to ensure we meet our shared goals. NAC received a summary of all the excellent recent outreach activities (*e.g.*, MEP & Perm Rep) and interactions where NAC input has been vital. This collaboration will continue, and we should look at ways to further improve this in the future.

1. **for discussion** 
   1. **Unfair trading practices**

Reference was made to the [recent webinar](https://aise.wall.idloom.com/#/filelastversion/19044) during which the background of the Unfair Trading Practices was explained by AIM to the members of Cosmetics Europe and A.I.S.E. In order to prepare for the revision of this Directive, which most likely will become a Regulation and extended scope to also include non-food products, a survey from AIM has been issued. This survey has been shared with the members of Cosmetics Europe and A.I.S.E. to be filled in by the companies and to be shared by National Associations with their members for replying to AIM by 3rd October.

Feedback was provided by some NAC members about unfair practices on our products reported from their members, and therefore assessing the impact to prepare for the revision was welcome. It was however asked whether the questionnaire was legally checked with regard to compliance to competition law.  
***ACTIONS:  
-Check with AIM the legal clearance of the questionnaire. (A.I.S.E.)  
-Distribute the questionnaire to the respective members to be filed in by 3 October 2022 (NAC)***

***Post-meeting note: For the legal question, see email of S.Zänker sent on 21 September.***

1. **Preparation for the next board meeting**
   1. **Key priorities and organisational changes: recommendation to the Board**

An overview was presented ([see slides](https://aise.wall.idloom.com/#/filelastversion/19187)) of the A.I.S.E. analysis asked by the Board in April to have an A.I.S.E. that is “Fit for the Future”. The objective, the A.I.S.E. advocacy priority areas, the organisation review (internally and throughout the working groups) and the resource assessment of the A.I.S.E. team was presented. This is the result of discussion in many working groups, the MC and the previous NAC, and should be discussed by the NAC to be finalised for the Board meeting on 19 September.

The comments from the NAC were as following:

* A.I.S.E. policy priorities: agreed
* Strategic policy groups: agreed; request for an official launch of the structure, governance, ToR once approved by the Board.
* Horizontal issues: Assess at the level of the MC the interest, potential collaboration with other interested sectors, the way forward (specific action, or political awareness raising), the impact and also whether the person who raised the issue can take the lead, build on material produced by National Associations.
* Resources: All agreed that the A.I.S.E. agenda and workload is high, however all emphasised the also the current economic climate making a call for more funds to A.I.S.E. difficult. It was mentioned that the inflation is already heavily impacting the A.I.S.E. budget, which will be looked at by the Financial TF soon with the aim to ensure a sustainable budget of the association. A call was made to look again into the internal resources and capacities.

In this context also the question about the work to review the Charter in the framework of the CEAP initiated by the SSG/ approved by the Board and its financial consequences, requiring an external consultant was raised. In particular from which budget the consultancy work would be taken, ie A.I.S.E. general budget or Charter budget. The point was taken and will be further assessed once the consultant and the concrete work package has been assessed by the SSG (see also above, agenda item 4.2.3).   
***ACTIONS:  
- Share with the NAC the*** [***organisational chart***](https://aise.wall.idloom.com/#/filelastversion/19271) ***(A.I.S.E. secretariat)   
- Consider the NAC comments when reviewing the finances (H. Razenberg/ H. Fabiansen)***

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

Refer to [annotated agenda](https://aise.wall.idloom.com/#/filelastversion/19050) . No questions were raised by the NAC.

* 1. **Biocides**
  2. **PC&H sector**

1. **Next Meeting DateS and closure of the meeting**

Thursday 8 December 2022 - 09:00-13:00 (Brussels – A.I.S.E.)

***Post-meeting note: location tbc***

***Dates for 2023:***

Thursday 26 January 2023, 10:00-13:00 (webconference)

Tuesday 21 March 2023 (joint lunch & meeting with MC), 13:30 -16:30, webconf or Brussels (A.I.S.E.) or tbc; a proposal for preparing the work plan 2023-2024 will be suggested.

Wednesday 22 March 2023 (+ lunch), 13:00-15:00, Brussels (A.I.S.E.) or webconf tbc

Monday 12 June 2022, 10:30-16:00, Brussels (GA A.I.S.E. on Tuesday 13 June)

Thursday 14 September 2023, 14:30 – 17:30, Denmark (hosted by H. Fabiansen)\*

Friday 15 September 2023, 10:30-12:30, Denmark

Thursday 7 December 2023, 09:00-13:00, Brussels (A.I.S.E.)   
***\*ACTION:  
- Check with Cosmetics Europe whether in September 2023 the order of the back-to-back meetings could be inverted, i.e., first the A.I.S.E. meeting and then the Cosmetics Europe one. (A.I.S.E. secretariat / S. Karjomaa, H. Razenberg, H. Fabiansen)***

Full draft calendar 2023:



**ACTIONs RECAP**

|  |  |  |
| --- | --- | --- |
| ***What*** | ***who*** | ***when*** |
| ***4.1.3.1 GRA:***  ***- Share intelligence on MS positions on GRA with A.I.S.E.***  ***- Provide A.I.S.E. and DUCC material for use by NAC members*** | ***NAC***  ***A.I.S.E.*** | ***asap*** |
| ***4.1.3.2.***  ***- Share any information on Member States positions on microplastics restriction proposal with A.I.S.E. secretariat***  ***- Develop advice and guidance for members in Microplastics TF*** | ***NAC***  ***A.I.S.E.*** | **Oct.** |
| ***4.2.1.ESPR***  ***- Check with AIM accordingly on rating apps and company names*** | ***A.I.S.E.*** |  |
| ***4.2.3.2 CEAP – Consultancy - Prepare options for funding structure related to Charter with focus on LCA work - Prepare ideas for Charter workshop with NAC members & bring back to NAC*** | ***A.I.S.E./SSG***  ***A.I.S.E./SSG*** | ***11 Oct***  ***asap*** |
| ***7.1. UTP - Check with AIM the legal clearance of the questionnaire.  -Distribute the questionnaire to the respective members to be filed in*** | ***A.I.S.E.***  ***NAC*** | ***21.09***  ***3 Oct.*** |
| ***8.1. Fit for the future - Consider the NAC comments when reviewing the finances*** | ***(Razenberg/ Fabiansen)*** | ***20/10*** |
| ***10. Check with Cosmetics Europe for inverting the order of September 2023 back-to-back meetings*** | ***A.I.S.E./ Karjomaa/Razen-berg/Fabiansen*** | ***On***  ***going*** |

Document name: 2022-09-15\_16 NACMinutes A.I.S.E., 30 September 2022