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| national associations meeting 01/2023 |
| Minutes | **Webex teleconference** Thursday 26 January 2023 10:00-13:00 CET |

**Participants**

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| Mr Giuseppe ABELLO, Assocasa Mr Bernard CLOETTA, SKW Ms Ana-Maria COURAS, A.I.S.D.P.L.Ms Pilar ESPINA, Adelma Ms Helle FABIANSEN, KoHB Mr Christian GRÜNDLING, FCIOMr Olof HOLMER, KOHFMr Lukas HORAK, CSZV Ms Inara JONISKIENE, LikochemaMs Sari KARJOMAA, KH *(Chair)*Mr Thomas KEISER, I.K.W. Mr Philip MALPASS, U.K.C.P.I.Mr Istvan MURANYI, KOZMOSMs Anna OBORSKA, P.A.C.D.I. Ms Tulin OZKOCA, KTSD Ms Jelena PEJCINOVIC, KozmodetMs Mihaela RABU, Rucodem Mr Finn RASMUSSEN, V.L.F.Mr Hans RAZENBERG, N.V.Z*.(Vice-Chair)*Ms Françoise VAN TIGGELEN, Detic  | From A.I.S.E. (for their respective topics): Ms Cindy CHHUONMr Luca CONTIMr Dave HEMINGWAYMs Bahar KOYUNCUMr Sascha NISSENMrs Jan ROBINSONMs Amelie WEBERMs Majlinda COBAJMs Susanne ZÄNKER ApologiesMs Virginie d’ENFERT, FHER Mr G. Vlassopoulos, SEVAS |

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

The meeting was opened by the Chair, S. Karjomaa, who welcomed the participants to the Webex.
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**](https://aise.wall.idloom.com/#/filelastversion/19807) **& REVIEW OF ACTIONS OF LAST MEETING (8 Dec.22)**

The meeting minutes were approved, and all actions were undertaken, or will be covered through the agenda.

1. **GOVERNANCE**
	1. **Membership fees 2024-2025**

An update of the discussion of the Financial TF meeting of 12 January was provided inviting the NAC to comment. The mandate of the TF (with H. Fabiansen and H. Razenberg for the NAC) is to secure the financial stability of the A.I.S.E. budget short and mid-term, as currently the expenses are exceeding the income, meaning that the financial set-up is not sustainable. For the Financial TF discussion, several documents had been looked at such as the work plan (which due to the Green Deal is massive), the closing figures from 2022 budget, the development of the operational reserves, the BE inflation forecast for 2023, the approved figures for 2023 and the forecast for 2024-2025. H. Fabiansen explained that a balance between the budget and the activities needs to be found, reflecting the voices and needs of both small and big companies. In view of the rapidly evolving environment, it is a journey, where adjustments will also be made when reviewing the situation again end of 2023. The importance is to set now the membership fees for 2024 to give visibility to all members when forecasting their next year’s budget.

The NAC took note of the proposed increase of the 2024 membership and referred to the impact on their respective situations. They stressed the importance to secure a strong network, meaning that also at local level a financial stability needs to be ensured via a stable membership in each National Association. Consequently, the call was made for strengthening the communication about the benefits of the network, such as diversity, inclusion of SME, the capability of the outreach across the EU, support in the implementation and enforcement phase in member states of adopted legislation, etc. For this purpose, it was suggested to build on the presidential speech for the G.A., allowing NAs to use it with their respective members. A.M. Couras referred to a comprehensive FEA internal document (post-meeting note: not for circulation outside FEA membership), in which all the achievements of the last year were featured.

In March a joint working session of representatives of the NAC and MC will also assess the work plan 2023-2024, to carefully screen the activity plan and to set priorities. With F. Van Tiggelen, H. Razenberg and B. Glassl being part of the discussion group, the mandate was given to them. The NAC was invited to provide to them any input in advance, and if possible, already by Mid-February when the MC meets next.([see detailed workplan](https://aise.wall.idloom.com/#/filelastversion/19397) as approved in Nov. 2022)

Conclusion: The following points were highlighted and captured for the summary to be shared at the Board meeting on 7 February:

* It was acknowledged that with expenses exceeding income every year, A.I.S.E.’s budget/finance model is not sustainable.
* The call from the NAC to ensure a strong & sustainable network through membership at local level by securing the financial commitment of companies in NAs.
* The recommendation of the Finance TF was noted, i.e. an increase of the A.I.S.E. membership fees not be more than 4% in 2024.
* The threshold of 650K would be reached by end of 2025 – hence the level of the threshold up for Board discussion.
* Revise A.I.S.E.’s workplan and activities in detail for potential savings (MC/NAC in March).
* The finance TF will monitor the development of inflation and of the financial situation and make proposals on budget and fees 2025 by end of 2023/beginning of 2024.

***ACTIONS:
- Share with the Board at its 7 Feb meeting the feedback from the NAC
- Develop a document that describes the achievements/ benefits of the network, based on the presidential speech (A.I.S.E. secretariat)
- Provide feedback to the NAC delegation for the 2023-2024 A.I.S.E. work plan discussion (NAC)***

* 1. **Members’ Forum during GA** *(D.Hemingway)*

The Forum is for the Members, and the Secretariat wants to ensure that the session is as productive and useful as possible for our Members. The NAC was requested to send proposals/ideas for both the topic and format for the Members’ Forum during the General Assembly to the Secretariat. Giuseppe Abello suggested that ensuring coherence across the various different legislative processes that will impact the industry, especially labelling (*e.g.*, CLP, Det Reg, PPWD), was important and the Secretariat agreed to explore how this could be addressed.

1. **Key topics for discussion**
	1. **CLP Revision** *(C.Chhuon/D.Hemingway)*

An update on timelines was provided with a focus on public affairs.
The NAC was informed about the status of the CLP revision. The Ordinary Legislative Proposal was discussed with the CLP WG and Public Affairs SG on 13 January and a first assessment was circulated for review following that. The public consultation on Have Your Say being postponed regularly, A.I.S.E. will have enough time to ensure alignment with DUCC and Cefic - or decide to defend some topics alone where necessary.
The first meeting of the GHS’ Informal Working Group on Potential hazard issues took place on 24 January and J. Robinson provided an overview of the situation. The support of the NAC will be requested in due course to influence national delegations participating in the IWG and in the Sub-Committee.

The Chair informed the NAC members about the intention of the Finnish Authorities to oppose at Council level against the usage of a delegated act to include new hazard classes. Additionally, although the Danish Authorities are neutral on this topic, the Danish Association will also include this point in their response to the Have your say consultation.

* 1. **Microplastics restriction: intelligence on REACH Committee** *(J. Robinson)*

The latest draft restriction text (not yet publicly available on the [Comitology Register](https://ec.europa.eu/transparency/comitology-register/screen/committees/C34200/consult?lang=en)) includes modifications to the criteria for the solubility derogation. Ongoing consultation of the relevant task forces suggests that these changes are problematic; clarity is needed on the intent behind them (i.e., will there be a requirement or expectation to fractionate and test solubility for every molecular weight fraction of a polymer separately).

I. Joniskiene had learned that only a preliminary vote is expected in the REACH Committee at the end of February; the final vote may be in April or June. A.I.S.E. will provide supplementary advice to assist NAC members in dialogue with REACH Committee members.
***ACTION:
- Develop advice on latest changes and provide to NAC members (A.I.S.E. secretariat with Microplastics TF****)*

* 1. **Chlorine bleach / Preventing terrorism – new rules on the marketing and use of high-risk chemicals**

IKW informed A.I.S.E. that the Commission recently released a report on chemicals of high risk in relation to terrorism proposing measures that could be of relevance for some chlorine containing products of our industry (see presentation). IKW is providing input to VCI (deadline to COM report is 20.2), as they will not take the lead for this topic, with bleach products being not so important in Germany, which however could be different in other members states. When discussed at the MC earlier this week, it was agreed to monitor the topic, likewise it was done for explosive precursors. B. Glassl agreed to keep the MC updated on any further developments. The MC also suggested to potentially work on an acceptable threshold on chlorine concentration in products, and to convey the message to the NAC for also their input.
The proposal from the Commission is expected in QIII.
*ACTION:
- Provide input to A.I.S.E. on typical values of chlorine concentration in products (feedback from MC/ NAC by latest mid-February).*

1. **Key topics for updates & questions**
	1. **ESPR**  *(B.Koyuncu/L.Conti)*

The A.I.S.E. team provided an update on the status of the ESPR file in the EP and Council, highlighting the state of art on the key priority topics for A.I.S.E. NAC members were invited to keep engaging with their authorities and inform A.I.S.E. Secretariat in case of relevant developments and/or exchanges at national level.

* 1. **UCPD** *(A.Weber/L.Conti)*

The A.I.S.E. team is continuing to follow the revision of the UCPD, with a particular focus on sustainability labels. In this regard, A.I.S.E. is engaging with the European Parliament to advocate for a third-party verification and certification system for sustainability labels (as proposed by the Commission), rather than for a pre-approval system run by public authorities at national level.

The NAC was informed of recent developments and was invited to:

* Share the A.I.S.E. position paper on sustainability labels and engage with national authorities;
* Gather intelligence of the preferred option of the respective Member State and share with the A.I.S.E. team.

On Dual Quality, NAC was informed that the EP has tabled amendments to re-introduce dual quality issues in the revised UCPD which are likely to be included in the final EP text. A.I.S.E. will liaise with AIM and other partners to assess possible joint actions.

In parallel, NAC members are invited to inform the Secretariat in case of developments / interest on this topic at national level, in particular ahead of the trialogue negotiations.

* 1. **Packaging and Packaging Waste Regulation** *(A.Weber/M.Cobaj)*

The NAC was updated on the proposal for the Packaging and Packaging Waste Regulation, published on 30 November 2022. A detailed assessment of the proposal was carried out by the Packaging WG together with the Public Affairs SG. Provisions on recyclable packaging, recycled content, obligations related to excessive packaging, harmonisation of labelling as well as refill and reuse targets were identified as priority areas. A.I.S.E. is currently aligning on a position paper and amendment suggestions. The NAC expressed strong concerns with the proposal and requested A.I.S.E. to participate to the EU Commission post-publication Public Consultation. The Secretariat will be reaching out to the rapporteurs and shadow rapporteurs of the file, as well as other MEPs. In parallel, in coordination with the NAC members, A.I.S.E. will engage with the Permanent Representations in Brussels.

* 1. **Governance of A.I.S.E. Sustainability Strategy** *(S.Nissen)*

Due to lack of time, it was agreed to cover the topic at the next NAC meeting. (see slides)

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

No further input was provided during the meeting or thereafter.

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

Refer to [pre-read document](https://aise.wall.idloom.com/#/filelastversion/19867)

* 1. **Biocides** *(E.Cazelle)*
	2. **Charter promotion: Webinar(s) / Amazon Climate Pledge Friendly program** *(S.Nissen)*
	3. **Update on EU Ecolabel – revision of criteria for detergent categories and potential A.I.S.E.
	 involvement** *(S.Nissen)*
	4. **PREPs governance** *(S.Nissen)*
	5. **Detergents Regulation Revision** *(C. Chhuon/D.Hemingway)*
	6. **GRA/Essential Use: update** *(J. Robinson)*

*Post-meeting note*: the invitation for the DUCC workshop on Assessment of Alternatives on 9th March was circulated on 26th January. NAC members are kindly requested to inform their competent authorities, especially those involved in REACH.

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

[*Tuesday 21 March 2023, 13:30 -16:30, working session at A.I.S.E. for the work plan with some designated NAC delegates being also some members of the MC]*

Wednesday 22 March 2023, 09:30-15:00, webconference

Monday 12 June 2023, 10:30-16:00, Brussels (GA A.I.S.E. on Tuesday 13 June)

Tuesday 12 September 2023 starting with lunch, 14:30 – 17:30, Denmark

Wednesday 13 September 2023 ending with joint lunch, 09:30-12:30, Denmark

Thursday 7 December 2023, 09:00-13:00, Brussels (A.I.S.E.)

Proposals for Webinars:?

**ACTIONs RECAP**

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| ***What*** | ***who*** | ***when*** |
| ***4.1. Fees:*** ***- Share NAC feedback with the Board at its 7/2 mtg- Develop a document that describes the achievements/ benefits of the network, based on the presidential speech - Provide feedback to the NAC delegation for the 2023-2024 A.I.S.E. work plan discussion***  | ***-Fin TF members******- A.I.S.E.******- NAC*** | ***-Board meting******-for GA******-asap*** |
| ***5.3. Provide input to A.I.S.E. on typical values of chlorine concentration in products***  | ***- NAC/MC*** | ***- mid Feb*** |

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