

A·I·S·E

International Association for Soaps,
Detergents and Maintenance Products

BUILDING A SUSTAINABLE, INNOVATIVE AND THRIVING CLEANING & HYGIENE INDUSTRY

KEY RECOMMENDATIONS



FOR EUROPEAN LEADERS

JANUARY
2019

€ 36 BILLION

MARKET VALUE OF THE INDUSTRY
IN EUROPE TODAY

500 MILLION

EU CONSUMERS BENEFIT FROM OUR
PRODUCTS AND SERVICES DAILY



CLEANLINESS & HYGIENE

**A CRUCIAL INDUSTRY FOR PEOPLE'S HEALTH
AND WELLBEING IN AND OUTSIDE THE HOME**

AT HOME
€28,6 BILLION
2017
market value

- Laundry Care
- Surface Care
- Dishwashing
- Maintenance Products
- Bleaches

**OUTSIDE
THE HOME**
€7,3 BILLION
2017
market value

- Healthcare
- Food, Beverage & Agriculture
- Kitchen & Catering
- Technical Cleaning
- Building Care
- Laundry

**THIS INDUSTRY DIRECTLY BENEFITS PEOPLE
IN MANY WAYS**

-  Protects our health and keeps our homes and public places clean and hygienic
-  Maintains the durability of goods
-  Makes our lives more pleasurable and satisfying
-  Increases productivity for companies
-  Adds to our sense of wellbeing
-  Protects investments in brands
-  Facilitates convenient and modern lifestyles
-  Contributes to sustainability

A.I.S.E. is the International Association for Soaps, Detergents and Maintenance Products. Based in Brussels, A.I.S.E. has been the voice of the industry to EU regulators for 65 years. Membership consists of 29 national associations across Europe, 18 corporate members and 8 value chain partners.

95,000 DIRECT JOBS IN THE INDUSTRY
360,000 JOBS IN WHOLE VALUE CHAIN

Introduction

The detergent and maintenance products industry is crucial to maintain the health and wellbeing of Europeans. Daily, over 500 million citizens benefit from cleaning and hygiene products and services that keep their homes clean, and ensure public places equally remain clean and hygienic.

The products and services provided by our industry fundamentally sustain these expectations. But our companies need to remain competitive and to thrive in order to continue delivering this essential contribution to today's society and be a source of economic growth and job creation. **With a market value of nearly €36 billion today, the industry creates over 95 000 direct jobs and 360 000 through the value chain.**

The European elections in 2019 present a unique opportunity to reinforce this industry's commitment to building *"a prospering cleaning and hygiene industry which is a role model for serving society in an innovative and sustainable way"*.

This vision, however, can only be realised within an EU legislative environment that supports these ambitions of growth, competitiveness and innovation.

A.I.S.E. therefore wishes to engage with EU leaders on how to reach the full potential of the EU Single Market. This manifesto sets out three recommendations we believe are essential for the next political term:

- 1. BUILD A STRONGER SINGLE MARKET AND ENSURE BETTER REGULATION**
- 2. CLOSE THE LOOP ON A CIRCULAR ECONOMY IN THE EU**
- 3. STRIVE TOWARDS AN ENHANCED INSTITUTIONAL FRAMEWORK FOR POLICY-MAKING IN THE EU**

"Our industry wishes to engage with EU leaders so as to continue providing European citizens with cleanliness and hygiene solutions in an effective and sustainable way."

A.I.S.E. welcomes discussion on the recommendations presented in this booklet. Please get in touch with us!



Susanne Zänker, A.I.S.E. Director General



Build a stronger Single Market and ensure better regulation

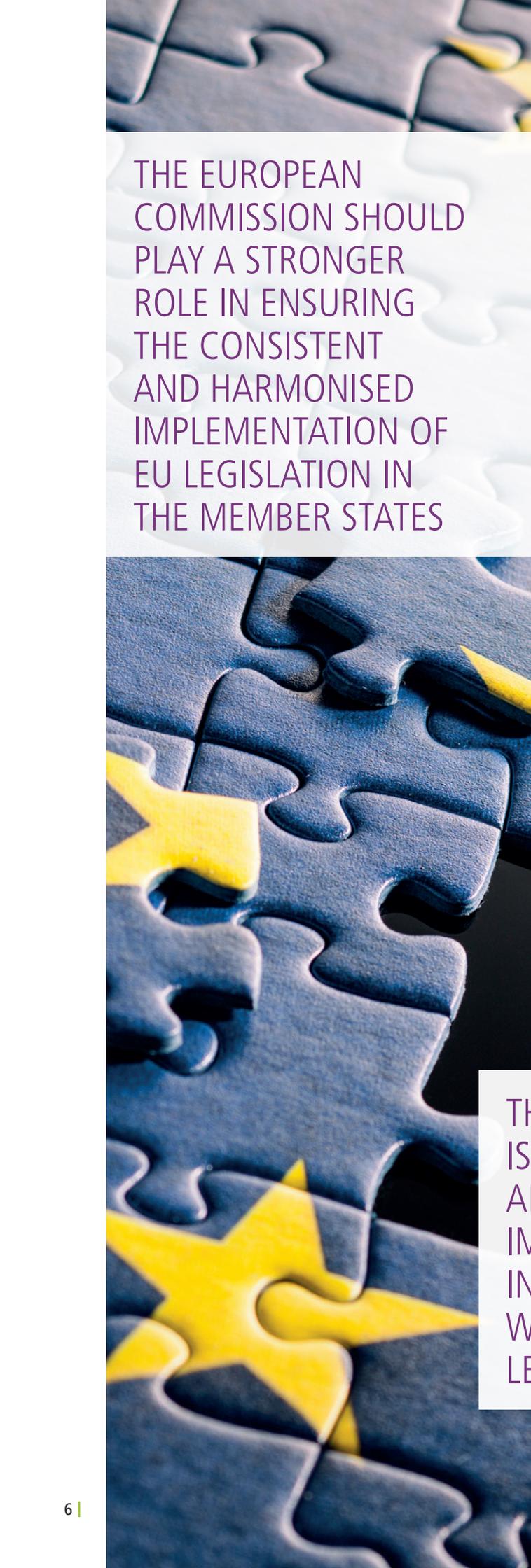
The EU Single Market celebrated its 25th anniversary in 2018. It has undoubtedly provided numerous benefits to European citizens and businesses, by enabling the free movement of goods, capital, services, and labour. The EU Single Market has contributed to significantly increasing the quality and variety of products available at the most competitive prices for consumers.

However, great care must be taken to ensure that the Single Market reaches its full potential and remains a cornerstone of the European project. Obstacles to the free movement of goods, and barriers to trade must be removed, particularly for companies operating cross-borders. Our industry is concerned that certain measures taken at national level may threaten the EU Agenda; e.g. additional labelling or reporting requirements for detergents, different perceptions of risk and consumer protection, protectionist measures on trade and allegations of differences in quality for similar products, non-evidence-based policy-making and gold plating. This adds additional compliance costs, as well as a layer of complexity and potential risk for the free-flow of goods in the EU.

The European Commission should play a stronger role in ensuring the consistent and harmonised implementation of EU legislation in the Member States and should be considered the authoritative and interpretative voice of EU legislation.

OUR RECOMMENDATIONS

1. PROTECT THE INDUSTRY'S LICENSE TO OPERATE
2. ENSURE A COHERENT APPROACH TO MARKET SURVEILLANCE
3. INTEGRATE RELEVANT CHANGES TO THE CLASSIFICATION, LABELLING & PACKAGING AND DETERGENTS REGULATIONS
4. ENSURE THE FUTURE AVAILABILITY OF IN-CAN PRESERVATIVES FOR LIQUID DETERGENTS
5. RECOGNISE THE INDUSTRY'S CONTRIBUTION TO THE SUCCESSFUL IMPLEMENTATION OF REACH
6. DEVELOP A STRONG 'NEW DEAL FOR CONSUMERS' FOR THE BENEFIT OF ALL



THE EUROPEAN COMMISSION SHOULD PLAY A STRONGER ROLE IN ENSURING THE CONSISTENT AND HARMONISED IMPLEMENTATION OF EU LEGISLATION IN THE MEMBER STATES

OUR PRIORITY

The industry upholds and fully endorses the principle of subsidiarity. However, many times, this leads to a lack of harmonisation in chemical, environmental and product-related policy. This greatly hampers efficiency and leads to uneven implementation of legislation in the EU, thus creating inequalities between national markets.

The industry's main priority is to deliver safe products and services with a limited impact on the environment on all national markets within the EU. To achieve this objective, the industry needs legal certainty and a level-playing field in the EU. The competitiveness of the industry will depend on the level of harmonisation of legislation as well as its implementation and interpretation in the EU Member States. An efficient legislative framework will support innovation, and in turn enable economic growth.

THE INDUSTRY'S MAIN PRIORITY IS TO DELIVER SAFE PRODUCTS AND SERVICES WITH A LIMITED IMPACT ON THE ENVIRONMENT IN ALL NATIONAL MARKETS, WITH LEGAL CERTAINTY AND A LEVEL-PLAYING FIELD IN THE EU

THE INDUSTRY'S RECOMMENDATIONS TO ENABLE ECONOMIC GROWTH AND LEGAL CERTAINTY

Horizontal principles:

- 1. Protect the industry's license to operate:** the industry calls for a continued engagement, collaboration and reinforced trust with policy-makers to guarantee that cleaning and maintenance products placed on the market are safe, fit for purpose and provide value for end-users. Similarly, maintaining their license to operate will enable companies to continuously improve and benefit from the Single Market. A.I.S.E. calls on EU and national authorities to set a long-term vision and EU Action Plan for the Single Market for the next 25 years to avoid the introduction of barriers impeding companies' license to operate.
- 2. Ensure a coherent approach to market surveillance:** market surveillance is a prerogative of Member States. This creates different levels of surveillance across the EU and an unlevel-playing field. In this respect, A.I.S.E supports increased mutual recognition and coordination between national and EU authorities. This could be achieved, for example, through a European Agency led by the Commission, responsible for providing guidance and ensuring a coherent approach across EU Member States. Furthermore, more accredited laboratories for both market surveillance authorities and industry to perform physical checks of products are needed.

Policy and regulatory recommendations:

- 1. Integrate relevant changes to the Classification, Labelling and Packaging (CLP) and Detergents Regulations:** the industry wishes to ensure that long-standing issues such as proportionate mixture classification, labelling redundancy and information overload on product labels are recognised as priorities. These priorities must be addressed by the next European Commission in collaboration with Member States and the United Nations' Globally Harmonized System of Classification and Labelling of Chemicals (GHS). A paradigm switch is necessary to recognise that more information on labels does not necessarily equate to better consumer protection.
- 2. Ensure the future availability of in-can preservatives for liquid detergents:** due to a lack of legal clarity, the industry is facing incredible difficulties in the implementation of the Biocidal Products Regulation (BPR) at local level. This leads to increased costs which are expected to continue to grow in the next few years¹. In addition, the ongoing BPR review programme for active substances (preservatives) used by the detergents industry is putting great pressure on the industry. As these substances are being restricted for use, the industry's options for ensuring the efficient preservation of its products are being increasingly challenged. A.I.S.E. warns against the disappearance of key active substances and calls for pragmatic solutions that will enable the industry to continue to formulate products efficiently.
- 3. Recognise the industry's contribution to the successful implementation of REACH:** A.I.S.E. asks that EU and national authorities recognise the historical contributions made by the sector to improve REACH, especially regarding supply chain communication and reducing animal testing. A.I.S.E. welcomes the opportunity to constructively contribute the industry's knowledge and expertise in future discussions.
- 4. Develop a strong 'New deal for Consumers' for the benefit of all:** products manufactured by the industry meet the highest quality standards. A.I.S.E. seeks to safe-guard the freedom for companies to formulate and market products in accordance with consumers' local expectations and needs across the EU. This does not impact the quality of the products. The Detergents Regulation already ensures that the industry must be transparent about the composition of its products (on labels or online). Detergents companies are willing to work collaboratively with all stakeholders to reinforce trust and provide the reassurance that it will continue to treat all consumers fairly and equally.

1. European Commission Cumulative Cost Assessment Report for the EU Chemical industry, 2017



2 Close the loop on a circular economy in the EU

In January 2018, the European Commission published its *European Strategy for Plastics in a Circular Economy*. This Communication highlights the central place that plastics have in society, along with the pressing need to address the existing challenges associated with littering and leakage into the environment.

Over the last 20 years, A.I.S.E. has actively worked with its member companies on their efforts to be sustainable and reduce the ecological footprint of cleaning and maintenance products at all stages of the product life cycle. This demonstrates A.I.S.E.'s proactive agenda and the willingness of the industry to be a force for change and a responsible industry.

We strongly believe in the value of self-regulation at sectorial level to address the environmental and sustainable development challenges. We call upon the authorities to enable our sector to continue its work and further develop its value chain collaboration, to come up with even more ambitious and impactful initiatives inspired by resource efficiency, sustainable development and a circular economy to providing sound cleaning and hygiene solutions for all European citizens.



COMMITTED TO THE GLOBAL SUSTAINABLE DEVELOPMENT GOALS



By working together to tackle water quality through chemical safety, reducing our environmental footprint and embracing the circular economy, we steer best practices and aim to be a role model industry. The A.I.S.E. Charter for Sustainable Cleaning is industry's flagship initiative since 2005 driving progress for more than 245 companies in sustainable production, design and consumption. More info: www.aise.eu/sustainablecleaning



On the specific topic of packaging – key for our sector to avoiding product leakage, ensuring safe and correct dosage, our sector has the following specific recommendations to the Plastic Strategy:

OUR RECOMMENDATIONS

1. INNOVATION RATHER THAN TAXATION
2. INFRASTRUCTURE AND VALUE-CHAIN COLLABORATION
3. LEGAL CERTAINTY AND ESSENTIAL REQUIREMENTS
4. A SCIENCE-BASED DEFINITION OF MICROPLASTICS



A.I.S.E. SUPPORTS A MULTI-STAKEHOLDER APPROACH TO PROVIDE EFFECTIVE, LONG-TERM SOLUTIONS



OUR PRIORITY

Our members are committed to reducing waste in their operations and help reduce consumer packaging waste through education campaigns and 'best use' information on products and online.

NEW INITIATIVE SINCE JANUARY 2019

The industry is pleased to promote its "A.I.S.E. voluntary initiative on plastic packaging", which aims to increase the uptake of recycled content in plastic packaging over the next few years. As part of this initiative, the industry commits to the following goals by 2025:

- **Min 20% volume of recycled plastic material**
- **All plastic packaging**
 - **recyclable**
 - **reusable**
 - **compostable**



Our priority is to ensure that safe materials remain available for packaged goods which are in full compliance with EU product safety legislation. A.I.S.E. supports the development of a strong market for secondary raw materials that will ensure the availability and highest quality for such materials.

Through smart packaging design, optimised practices with the value-chain, and a sustained drive in innovation, A.I.S.E. members will contribute to meeting the objectives of a truly Circular Economy, thus transforming the way cleaning products are designed, produced, used and recycled. A.I.S.E. acknowledges these challenges and supports a multi-stakeholder approach to provide long-term solutions.

THE INDUSTRY'S RECOMMENDATIONS TO ACCELERATE THE TRANSITION TO A CIRCULAR ECONOMY

- 1. Innovation rather than taxation:** A.I.S.E. believes that taxation on plastics is not appropriate. The industry considers it unjustified and discriminatory. To shift practices towards more sustainable packaging, the industry would rather support EPR modulated fees, and economic incentives to boost recycling and uptake of secondary raw materials. This could help bridging the gap between virgin and recycled plastics and help create a sustainable and affordable market.
- 2. Infrastructure and value-chain collaboration:** support from national governments and the EU is essential in the field of recycling and sorting technologies. Investments in infrastructure will help transition the EU economy towards being a global leader in waste reduction. To achieve this goal, A.I.S.E. supports investments from public authorities, and a strong dialogue and cooperation between all stakeholders in the value chain to find effective solutions.
- 3. Legal certainty and essential requirements:** the industry calls for a pragmatic review of the essential requirements of the Packaging and Packaging Waste Directive (PPWD) to help define core concepts such as "recyclability", thus providing greater legal clarity for businesses. In addition, because of the cross-border nature of our value-chains, it is also fundamental to safe-guard the Internal Market as the legal basis of the PPWD² to secure that goods can continue to be manufactured and transported efficiently across the EU.
- 4. A science-based definition of microplastics:** A.I.S.E. members have essentially phased out microbeads from their formulations. However, as not all polymers are plastics, A.I.S.E. strongly advocates against a blanket EU-wide ban likening all polymers with microplastics particles. A.I.S.E. calls for a definition based on the demonstrable effects of specific polymers on human health and the environment. A.I.S.E. supports a sensible definition of microplastics which must be science-based and thoroughly consider the existence of viable and cost-efficient alternatives.

2. Article 114 TFEU



3 Strive towards an enhanced institutional framework for policy-making in the EU

The 2019 EU elections present a unique opportunity for the next European Parliament, European Commission and the new College of Commissioners to redefine the agenda and political priorities for the next few years.

Along with the call for stronger focus on Competitiveness and Innovation³ outlined by the Industry4Europe coalition of 124 industry associations, it is also the opportunity to share the industry's views on what the ideal institutional framework should look like (e.g. new Commission Directorate-Generals and Units, Parliamentary Intergroups, etc.).

OUR RECOMMENDATIONS

1. INDUSTRIAL COMPETITIVENESS AS A POLITICAL PRIORITY
2. A CONTINUED DIALOGUE WITH POLICY-MAKERS
3. A CLEAR VISION AND LEADERSHIP RATHER THAN A COORDINATION ROLE
4. A PRAGMATIC APPROACH FOR ECHA
5. A CONTINUED AND INTENSIFIED PARTICIPATION OF THE EUROPEAN PARLIAMENT TO EU CHEMICALS POLICY

3. As stressed by a coalition of 124 industry associations in July 2018. See www.unife.org / Industry4Europe :
A governance structure

WE CALL FOR ENHANCED PARTNERSHIP AND COOPERATION TO TACKLE THE NUMEROUS CHALLENGES FOR THE BENEFIT OF BOTH INDUSTRY AND SOCIETY AT LARGE



OUR PRIORITY

A.I.S.E. calls for a longer-term vision for Europe's detergents and maintenance industry which requires a governance structure that goes beyond the six-month EU Presidency cycles and provide results during the next five-year mandate of the European Commission. It is fundamental that regulators in charge of developing policy impacting industry have a thorough understanding of company processes. A.I.S.E. will continue providing workshops, company visits, and trainings to all willing participants. A value-chain oriented approach in the internal organisations of DGs and Units of the European Commission, could also potentially help in providing a holistic view.

Such a governance structure would enable the European Commission, the European Parliament, and the Council together with industry stakeholders, to develop a common vision for a sustainable, innovative and competitive industry.

The industry aims to make proposals for a new governance structure which would enable the better implementation of an ambitious agenda for industry. Existing processes, policies and initiatives should be reviewed in order to provide added-value in a more coherent and efficient manner.

INDUSTRIAL COMPETITIVENESS AND SUSTAINABLE ECONOMIC GROWTH MUST BE CONSIDERED A TOP POLITICAL PRIORITY BY THE NEXT EUROPEAN COMMISSION

THE INDUSTRY'S RECOMMENDATIONS FOR AN EFFICIENT POLICY-MAKING FRAMEWORK IN THE EU

- 1. Industrial competitiveness as a political priority:** industrial competitiveness and sustainable economic growth must be considered as a top political priority by the next European Commission. A.I.S.E. calls onto the future President-elect to reflect this priority and to appoint a Vice-President of the European Commission specifically dedicated to Industry, in charge of developing and implementing the EU Industrial Strategy and ensuring the chemical industry's concerns are fully addressed in the future.
- 2. A continued dialogue with policy-makers:** existing European Commission expert groups with Member States and stakeholders (CARACAL, Biocidal Member States Competent Authorities, Commission Detergents Working Group) have proven to be helpful. These meetings should be maintained under the mandate of the next European Commission, and their number increased in the case of the Detergents WG (currently once per year), to address review and fitness checks of interest to the industry.
- 3. A clear vision and leadership rather than a coordination role:** Chemical legislation remains a prerogative for the EU institutions, and more is expected from the European Commission as a 'broker' of solutions. We call for an adequate allocation of resources to ensure a strong DG GROW for industry, and the appropriate involvement both at political and desk officers' level. Moreover, in its treatment of legislative proposals we call for enhanced partnership and cooperation in order to tackle the numerous challenges for the benefit of both industry and society at large.
- 4. A pragmatic approach for ECHA:** there is a certain level of unease in the industry regarding the lack of transparency and accountability of ECHA's Committee for Risk Assessment (RAC Committee). Independence of Member States' experts is key, but a lack of direct accountability and a silo approach to risk management may prove detrimental. A.I.S.E. supports a science-based approach founded on a risk-based assessment of chemicals. The industry encourages the Commission to take stock and mirror the functioning of the Scientific Committee on Consumer Safety (SCCS). In order to address resources issues at national level, A.I.S.E. also supports the organisation of a trans-national 'pool of experts'/ EU-wide forecasting which could be appointed at local level for short term missions.
- 5. A continued and intensified participation of the European Parliament in EU chemicals policy:** A.I.S.E. campaigns for the creation of a new parliamentary Intergroup which would bring together MEPs from all committees personally interested in the challenges and opportunities associated with the manufacturing, placing on the market and sale of non-food products such as detergents and maintenance products. This Intergroup could be a forum for MEPs to organise special hearings looking at various priorities of relevance for the industry.



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Through this extensive network, A.I.S.E. represents over 900 companies supplying household and professional cleaning products and services across Europe. The industry is a substantial contributor to the European economy with an annual market value of €35,9 billion, directly employing 95 000 and 360 000 through the value chain. A.I.S.E. has a long history in leading voluntary industry initiatives that focus on sustainable design, manufacturing and consumption, product safety and safe use of products by consumers and professional customers.

A.I.S.E. aisbl

Boulevard du Souverain, 165 | 1160 Brussels, Belgium
Tel: +32 (0)2 679 62 60 | Fax: + 32 (0)2 679 62 79
aise.main@aise.eu | www.aise.eu
VAT: BE 0538 183 615