

Foreword

A.I.S.E. represents a sector that brings essential products to market for cleanliness and hygiene in the home and in public spaces. As such, we contribute to Europe's economy through employment, research and development, and innovative and sustainable cleaning and maintenance solutions that enable Europe's businesses to function.

The elected and appointed EU leaders for 2024–2029 have a new mandate to implement the EU Green Deal through the legislative revisions and new proposals that they will take up. The top priorities for A.I.S.E.'s members today are the legislative trilogues for the revision of the Detergents Regulation and the Green Claims Directive. In addition, we are preparing for the evaluation of the Biocidal Products Regulation and anticipating the new chemicals industry package to simplify REACH. And we look forward to the European Council's Strategic Agenda 2024–2029.

It is essential that the new leaders deliver a regulatory framework that fosters innovation and takes account of the administrative burden on Europe's SMEs that run 85% of our sector's manufacturing facilities. As the first downstream sector to sign the Antwerp Declaration for a European Industrial Deal, A.I.S.E. underlines the need for investment to ensure that European industry remains competitive on a global scale.

This report outlines our very active engagement in the last 12–18 months to bring our valuable expertise to the policymakers in all three EU institutions. We will continue to engage with the legislators, meeting and greeting the new leaders, cooperating with the Council Presidency and the Member State authorities, and hosting our annual stakeholders' Cleaning & Hygiene Forum in the European Parliament for the first time on the 4th of December.

Our core business is to ensure availability of essential products and services that uphold our modern way of living, maintain our homes and businesses and protect our health through cleanliness and hygiene, in a safe and sustainable manner. This is our fundamental *raison d'être* and we are open to engaging with the legislators on all issues that will shape our sector for the coming decades. We invite you to browse this report and get in touch to discuss any of the topics covered.



Florian Vernay, A.I.S.E. President





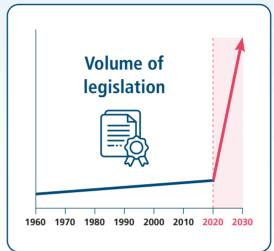
Alexis Van Maercke, A.I.S.E. Director General



A highly regulated industry requires a high level of engagement

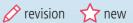
Prior to the introduction of the EU Commission's Green Deal in 2019, the EU legislative framework for this industry was created over 60 years with the introduction of fundamental building blocks that were introduced and revised over the decades. The implementation of the Green Deal brings with it a revision of almost all regulations that govern our industry, in addition to new laws, within a single decade. The unprecedented simultaneous overhaul of so much legislation will have a severe impact on the industry, in particular on Europe's small and medium sized companies that operate the majority of Europe's manufacturing facilities.



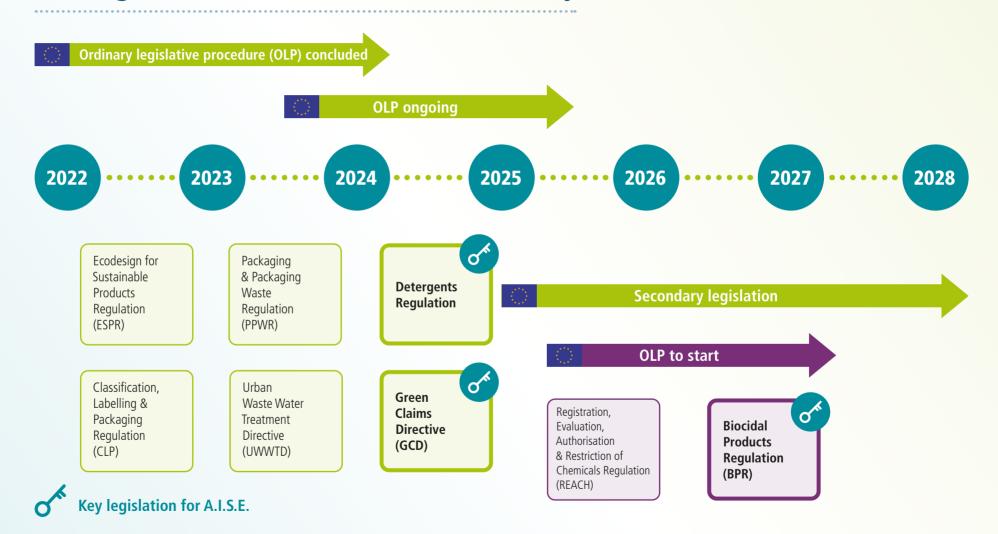


Prior to 2020 (over 60 years)	
1960s	Dangerous Substances Directive
1970s	Directives on detergents & on biodegradability of surfactants
1980	Dangerous Preparations Directive
1990	Biocidal Products Directive
2000s	REACH, CLP, Detergents Regulation
2010	Biocidal Products Regulation

2020–2030 (in 10 years)			
Detergents Regulation			
CLP	Ø		
REACH	Ø		
Biocides	Ø		
Packaging & Packaging Waste	Ø		
Urban Wastewater Treatment	Ø		
Ecodesign for Sustainable Products (revision, but new for our sector)	OID		
Unfair Commercial Practices	Ø		
Ecolabel criteria	Ø		
Green claims	$\stackrel{\wedge}{\Box}$		
Climate neutrality	$\stackrel{\wedge}{\Box}$		
Deforestation	\Diamond		
Due diligence	\Diamond		
Taxonomy for sustainable activities	$\stackrel{\wedge}{\Box}$		
Restrictions: microplastics, PFAS	$\stackrel{\wedge}{\Box}$		



This decade is seeing the implementation of a new legislative environment for our industry



A year in review – A.I.S.E.'s activities in 2023–2024

Revision of the Detergents Regulation is A.I.S.E.'s single highest priority

A.I.S.E. is the custodian industry for the implementation of the Detergents Regulation, which regulates our core business. Such a fundamental revision takes place once in a generation and sets the scene for the coming decades. We are therefore actively engaged in supporting and contributing to every aspect of this process.



How A.I.S.E. is contributing to the revision



Supporting simpler labelling

A.I.S.E. supported the Commission's proposal in early 2023 to simplify labelling and remove redundancies and overlap with other chemicals legislation (REACH) as well as CLP.

Maintaining high levels of protection

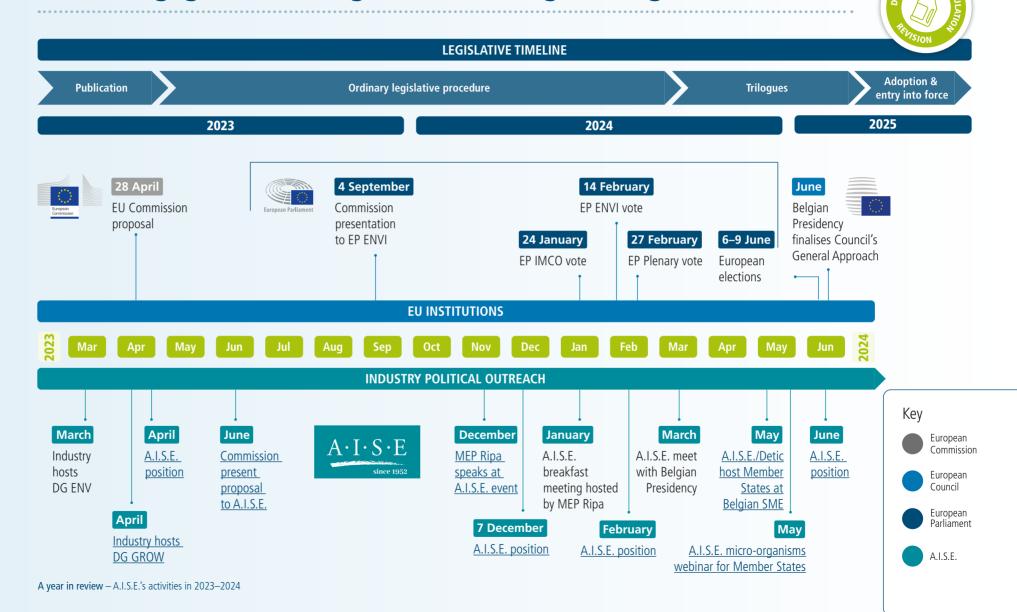
The current regulation already provides a high level of protection for human health and the environment, and we have engaged with members of the European Parliament as well as other policy makers to show how this is the case. The revision also needs to be implementable in practice and foster industry innovation.

Recognising the impact on SMEs

A.I.S.E. and its members have initiated several visits for national attachés from the Member States including representatives of the Belgian Presidency of the Council to share first-hand the impact on businesses, in particular SMEs. Once the trilogue negotiations begin between the three institutions in autumn 2024, A.I.S.E. will be present to safeguard these priorities to ensure a stronger internal market, sustainability and innovation for the industry.



A.I.S.E. engagement throughout the Detergents Regulation revision



Revision of the Detergents Regulation is A.I.S.E.'s single highest priority



There are four aspects of the Detergents Regulation revision that are of particular concern to A.I.S.E.



Biodegradability

Adaptation of current test methods or creation of new test methods is needed before applying biodegradability criteria to larger molecules, such as those in soluble films in detergent capsules.



Microorganisms

The use of microorganisms in detergents corresponds to an innovative technology. The provisions to be included in the Detergents Regulation concerning microbial cleaners should provide clarity on how these products are regulated while supporting innovation.



Phosphorus

Our industry is not a major contributor of phosphorous releases into the environment. and replacing the unique properties of phosphorus could have an adverse impact on the environmental sustainability of products.



Digital product passport

and Ecodesign Regulation,

A.I.S.E. position on the **Detergents** Regulation revision



A digital product passport (DPP) is a new concept being introduced in the Detergents Regulation, which aims to enhance the transparency, traceability, and sustainability in the production and consumption of detergent products.

The concept is being introduced under two regulations – A.I.S.E. calls for the transition period for implementing the DPP to start after the secondary legislation for both the Detergents and the Ecodesign (ESPR) Regulations is adopted, to ensure coherence and a single system that is not overly complex or burdensome for small and medium businesses across European to implement.

Read more about the **Ecodesign for Sustainable Products Regulation**



EU legislators get a first-hand understanding of the business impact of the Detergents Regulation



A.I.S.E. and Detic host the Belgian Presidency of the Council and other Member State attachés on 17 May 2024 at REALCO, a Belgian SME in Wallonia. The legislators get a firsthand view during a plant visit and through direct conversation with the REALCO team, of the real impact of the revision of the Detergents Regulation on an SME.

See A.I.S.E. press release



A year in review – A.I.S.E.'s activities in 2023–2024



It's crucial that we cultivate an environment free from additional administrative burdens to allow creativity and efficiency to thrive and ensure that innovation is not blocked by overregulation. Consumer preferences are increasingly leaning towards products with reduced environmental impacts, and Europe's SMEs have the flexibility to meet these demands and drive the industry towards sustainability.

George Blackman, **CEO Realco**



A.I.S.E. is invited to the European Parliament during the Detergents Regulation revision



In January 2024, MEP Manuela Ripa, Rapporteur for the Detergents Regulation, hosted a breakfast at the European Parliament. A.I.S.E. was invited to exchange views and share our expertise on the ongoing revision of the Detergents Regulation.

A.I.S.F. Director General Susanne 7änker tells the audience that:



Having represented this industry for nearly 19 years, I am proud to say that we don't just talk the talk, we walk the walk and have been doing so for more than 25 years. We introduced our first sustainability initiative in 1997, followed in 2005 by the A.I.S.E. Charter for Sustainable Cleaning, a comprehensive sustainability assurance scheme covering the whole lifecycle that delivers real results, for example, reducing CO2 emissions by 42% between 2006 and 2024.



L to R: Jan Robinson and Susanne Zänker of A.I.S.E. with MEP Manuela Ripa, Rapporteur for the Detergents Regulation



The European Parliament plenary session adopts its position on the Detergents Regulation - their vote is a significant step forward in defining the revision of this key legislation for our sector.

A.I.S.E. engages with stakeholders on core aspects of the Detergents Regulation



A.I.S.E. hosts a webinar for its members at the outset of the revision of the Detergents Regulation in June 2023. Hans Ingels and Ioanna Vasilaki from the European Commission's DG GROW present the scope of the Commission's proposal to the network, on a panel moderated by A.I.S.E. Director General Susanne Zänker.



A.I.S.E. together with EuropaBio and AMAEE run a webinar for stakeholders on 7 May 2024 on microorganisms in detergent products, a key innovation of this industry. This event is moderated by A.I.S.E. Director General Alexis Van Maercke. It takes place

at a decisive moment in Detergents Regulation revision and is attended by national authority representatives from 16 Member States, the European Commission, industry and value chain partners. Discussions from both SME and multinational perspectives cover microbial cleaners, safety assessment of microorganisms and the need to protect future innovation for the category.







The A.I.S.E. network opens its doors to engage directly with EU decision-makers on business challenges



A.I.S.E. hosts the European
Commission's DG ENVI of the
European Commission at the
P&G Brussels Innovation Centre
in March 2023, providing insights
into how the industry uses consumer feedback
when considering performance, sustainability and
efficiency of laundry solutions.



In October 2023, A.I.S.E. hosts DG GROW at a visit to Spechim, an innovative Belgian SME showcasing solutions that contribute to a more sustainable future through technology and sustainable practices and a vision for a greener and cleaner planet.



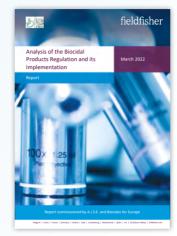
MEP Manuela Ripa, Rapporteur for the Detergents Regulation revision, visits Ha-Ra GmbH, a German manufacturing plant with the IKW in October 2023, The visit was an opportunity to get hands-on insight into challenges of medium-sized enterprises.

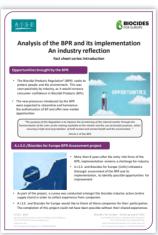


Industry needs predictable & harmonised legislation to bring biocides to market

In 2023 the Commission officially communicated its intention to conduct an evaluation of the Biocidal Products Regulation (BPR). Biocidal products manufactured by A.I.S.E.'s members include a vast range of disinfectants for household and institutional use as well as insect control products, all of which are regulated under BPR. However, there are many issues for companies to implement the current regulation, more than 10 years after its entry into force. The future review is an opportunity for simplification and harmonisation of approval procedures and a priority for our sector.

Together with Biocides for Europe, A.I.S.E. has analysed in detail the issues with implementing the current regulation and set out practical recommendations for improvement in a joint report and series of factsheets. Obstacles for bringing essential products to the market include unpredictability due to a lack of harmonisation across Member States, moving goalposts, delays, complex procedures as well as difficulty finding evaluating competent authorities.



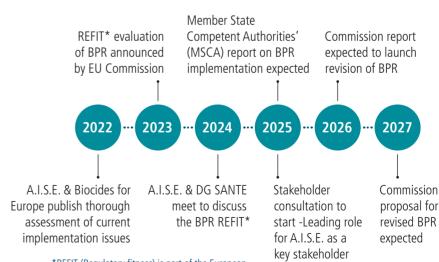


A.I.S.E.'s recent work to support the industry understand and comply with BPR includes two training sessions on biocidal product families, detailed comments on the current revision of one of the implementing laws, the Same Biocidal Products Regulation, as well as

ongoing contributions via the Biocidal Competent Authorities meetings.

Why biocides are important for public health

Timeline for evaluation of BPR



*REFIT (Regulatory fitness) is part of the European Commission's Better Regulation agenda aiming to make EU laws simpler, more targeted and easier to comply with.

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A.I.S.E. anticipates the new chemicals industry package for REACH

Despite the delay in the launch of the revision of REACH, A.I.S.E. continues to lay the groundwork for our sector, working as part of the Downstream Users of Chemicals Coordination Group (DUCC) to promote its priorities. These include substitution planning and assessment of alternatives, the concept of essential uses, limiting the extension of the Generic Risk Management Approach (GRA) and the Mixture Allocation Factor (MAF).



May

European Commission initiates impact assessment for a revision of REACH "to help achieve a toxic-free environment" A.I.S.E. participates in >10 relevant workstreams over 3 years

25 Sep

EU Ombudsman publishes recommendation to Commission to publish full impact assessment for the revision of REACH

Oct

2023 European Commission indicates revision of REACH to be initiated under mandate of new EU Parliament

20 Mar

2024 DUCC presents its online training tool to DG Employment's WP on chemicals

1 Mar & 1 Oct

2024 A.I.S.E. and DUCC contribute to Commission workshops on substitution planning New chemicals industry package to simplify REACH expected

2021

2022

2

2023

2024

2026

Mar, Apr, Nov

2023 DUCC hosts online workshops and information sessions on its priorities for the REACH revision Sep

2023 DUCC informs DG Employment's WP on chemicals about its online training tool

15 Mar

2024 EU Ombudsman closes its inquiry into the REACH impact assessment with a conclusion of maladministration by the Commission

22 April

2024 European Commission publishes its communication on the essential use concept for chemicals

REACH implementation is a priority for all downstream users

Our sector believes that professional workers should be out of scope of the GRA. To support this, DUCC is currently developing an online training platform for professional users on the safe handling and use of chemical products. This tool will be available by early 2025 in all European languages, with general and sector-specific modules, and has been presented to the European Commission. A.I.S.E. is collaborating with the association of professional cleaners to ensure relevance of the new training material.





Downstream Users of Chemicals Co-ordination group

Training for professional users

On 29 November 2023, A.I.S.E. participated in a DUCC information session on the challenges in REACH implementation with participants from the European Commission, Member States, industry and other stakeholders. Topics discussed included substitution, polymers registration, MAF and GRA. DUCC calls on the EU Commission to engage with downstream users to address together the assessment of alternatives and substitution as well as supply chain communication.

www.ducc.eu

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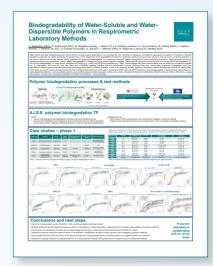
Testing the biodegradability of polymers

A.I.S.E. contributes to the advancement of biodegradability science for key ingredients used in the detergents industry. The A.I.S.E. Polymer Biodegradation Taskforce published the first phase of its work in Science of the Total Environment (Volume 01, 25 November 2023). This work was showcased at the 34th annual meeting organised by Society of Environmental Toxicology and Chemistry (SETAC) in Seville in May 2024.

A multi-laboratory evaluation of polymer biodegradation assessments, using standard and modified respirometry methods based on the OECD 301 Test Guideline on Ready Biodegradation, produced highly reproducible results and confirmed the viability of OECD 301 as a screening method for the subset of polymers tested.

Further research is needed to represent the large chemical domain of polymers, and to identify slowly degrading polymeric reference materials to provide a better assessment of inoculum performance over longer test durations. Work continues to develop modifications / refinements to tests and promote these for official recognition, and to build a body of data that can be provided to inform regulators drafting guidelines for polymer persistence assessments.



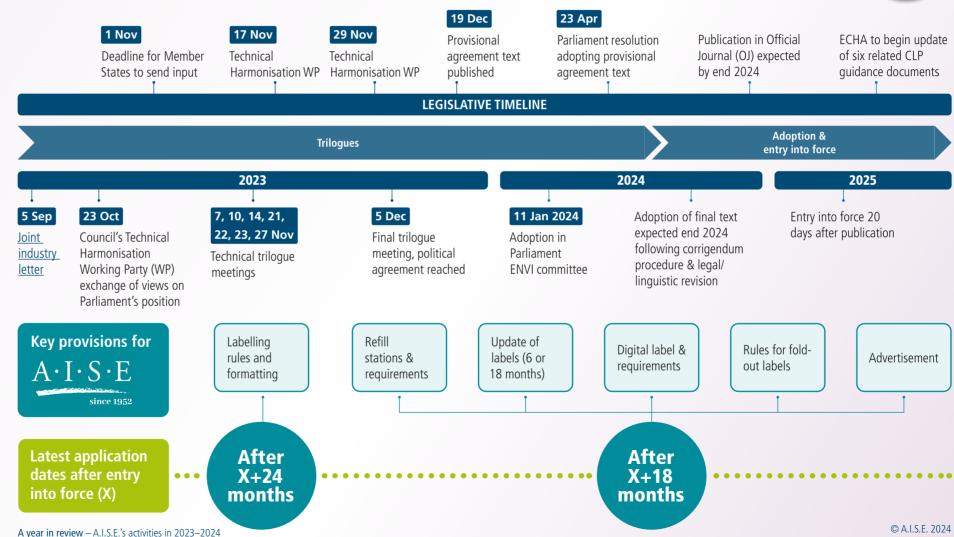






A.I.S.E. remains engaged to support implementation of revised Classification, Labelling & Packaging Regulation





A.I.S.E. continues its active engagement on the implementation of the new CLP Regulation

A.I.S.E. has been actively engaged in the revision of CLP and welcomes several aspects of the new regulation in particular: the agreement not to extend the requirements for <u>Child Resistant Fastenings</u> and <u>Tactile Warnings of Danger</u> to additional hazard classes/categories, most notably serious eye damage (Cat. 1) until a future Commission evaluation; explicit recognition of fold-out/booklet labels as solutions for multi-lingual labelling; and a prohibition on making misleading statements in advertising rather than a ban on green claims.

A.I.S.E. continues to work with the Commission and ECHA to find solutions to the implementation challenges that include new rules for label formatting, minimum font size and limitations on sales through refill stations.









A.I.S.E.'s concerns about the impact of CLP's new requirements

New label sizes and font will have a major impact on design, production & application

- Increased size of /additional packaging to accommodate information/ larger font contravenes legal obligations in packaging legislation
- Increased stock-keeping units (SKUs) will impact supply chains & may deprive some consumers of safety information in own language
- 24 month transition period too short to adapt large product portfolios
- Significant costs estimated for Europe's SMEs not addressed in Commission impact assessment

A.I.S.E.'s concerns about the impact of CLP's new requirements



Fold-out labels (FOL) are welcome but also have high economic and environmental costs



A.I.S.E.'s concerns about the impact of CLP's new requirements



The reality of including required hazard information on all **advertising** from radio to social media for relevant products will lead to impractical challenges for companies.

Current **timing for label updates** introduces practical challenges for formulators, suppliers and manufacturers that make up the supply chain, as well as increased waste due to scrapping old labels, packaging and products.

Detergent products classified as Serious Eye Damage Cat. 1 such as hand dishwashing liquids will be banned from refill sales, which will impact the sector's packaging waste ambitions







A year in review – A.I.S.E.'s activities in 2023–2024

A.I.S.E.'s agenda underlines Europe's climate neutrality and circularity ambition

Europe aims to be the first climate neutral continent and is striving for a more circular economy. Our sector is contributing to these goals through its work in specific areas, such as: the Green Claims Directive (GCD); the Ecodesign for Sustainable Products Regulation (ESPR); and the A.I.S.E. Charter for Sustainable Cleaning which is driving our sector towards more sustainable patterns of production and consumption.



Green Claims Directive

The Commission's proposal for the substantiation and communication of explicit environmental claims is one of the EU's measures to protect consumers from misleading environmental claims and enable them to make sustainable purchasing decisions.

A.I.S.E. is working to ensure that products containing hazardous substances can still communicate their positive impacts and that a clear and feasible framework for substantiating and verifying claims is adopted.

Ecodesign for Sustainable Products (ESPR)

ESPR will drive consumer choice and green public procurement by enabling a harmonised set of requirements for the sustainability of products in scope placed on the EU market.

A.I.S.E. welcomes the objectives of ESPR that complement its own sustainability ambitions, e.g. implemented through our own Charter for Sustainable Cleaning over the past 20 years. In particular, the increased focus on the product with a Digital Product Passport (DPP) will include information on the lifecycle and sustainability of both the product and its packaging.

A.I.S.E. Charter for Sustainable Cleaning

A.I.S.E.'s flagship sustainability assurance scheme has shown continuous and tangible results since it was launched in 2006 — Charter member are committed to ambitious targets for company and product standards throughout the entire lifecycle, with annual reporting.

A.I.S.E.'s engagement in the Green Claims Directive

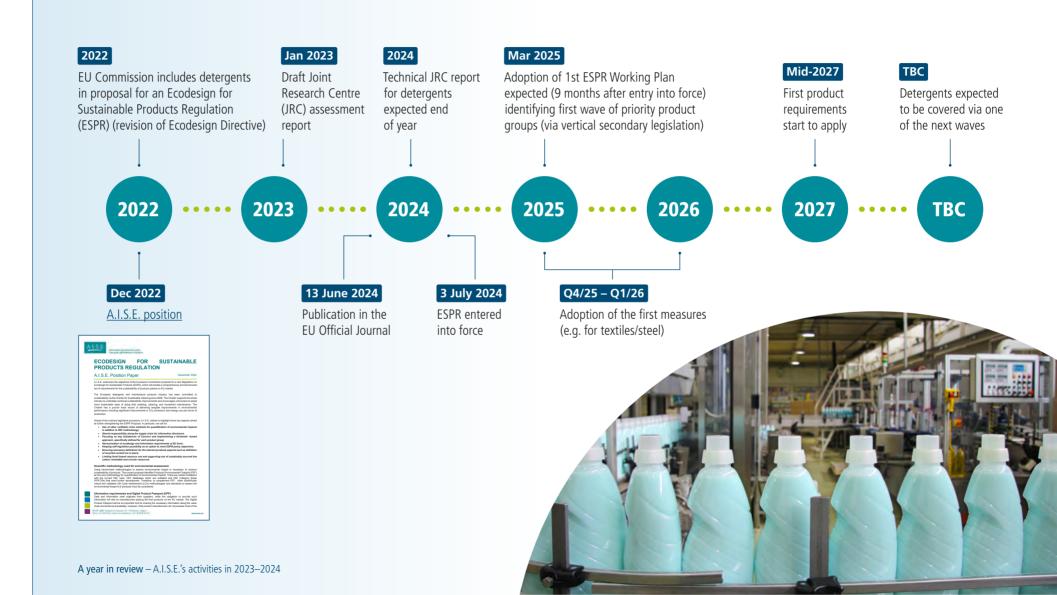




- 1. Not set any prohibition of environmental claims for products containing hazardous substances
- 2. Develop a clear and feasible framework for substantiating and verifying claims that ensures clarity, predictability and legal certainty, while minimising the burden on traders
- 3. Grant flexibility for the verification of the claims substantiation by using widely recognised sounding methodologies verified based on European or international standards, rather than enforcing a onesize-fits-all approach like PEF
- 4. Ensure legal certainty and consistency with other relevant legislation, particularly by addressing the safety and environmental impact of hazardous substances in products under sector-specific regulations (such as CLP, REACH, and RoHS)
- 5. Establish a practical and achievable timeline for implementing new provisions, giving businesses enough time to adapt and integrate necessary changes, ensuring that operations are not disrupted, and innovation is not stifled
- 6. Ensure greater harmonisation and mutual recognition across the EU to prevent inconsistencies and to create a level playing field for all businesses operating within the Single Market.

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Detergents now in scope of EU Ecodesign Regulation



Ecodesign for Sustainable Products

We believe the current ESPR framework should consider the following specific aspects for our sector:

Ecodesign requirements for detergents to be applicable to all products falling within a product group, and not based on individual articles

Introduce the transition period for the Digital Product Passport (DPP) only after the secondary legislation for both the Ecodesign and the Detergents Regulation has been adopted.



Read more about the DPP.

Essential to have focussed assessment for the European market and not make misleading conclusions based on global and outdated data.

Waste effects as well as material efficiency and lifetime extension should be addressed via the packaging and packaging waste legislation.



Susanne Zänker of A.I.S.E. joins the European Forum for Manufacturing and APPLiA's dinner debate on the proposed Ecodesign for Sustainable Products Regulation. The debate included presentations from the Commission, MEPs and industry associations



A.I.S.E. leads by example for a sustainable future

The A.I.S.E. Charter for Sustainable Cleaning covers the economic, environmental and social pillars of sustainability and thus contributes directly to the EU Green Deal through its tangible, measurable progress year after year since 2006.

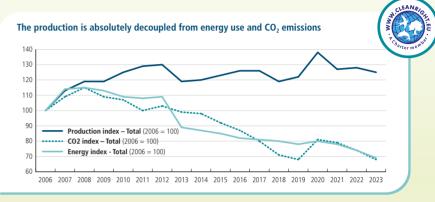
The A.I.S.E. Charter is officially recognised in several countries, and EU stakeholders have appreciated its contributions to the EU's circular economy ambitions. The deliverables by Charter member companies are steering best practices in our sector, and these results are an important tool in A.I.S.E.'s stakeholder outreach and external communication.

A.I.S.E.'s aim is that the Charter remains a scientifically meaningful, robust, measurable and pragmatic tool for industry, in particular SME-friendly, and both valuable and understandable to end-users when making conscious purchases.



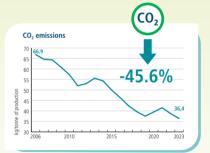
www.sustainable-cleaning.com

1 EU Green Deal goal: "Economic growth decoupled from resource use"



2 EU Green Deal goal: "No net emissions of greenhouse gases by 2050"





BU Green Deal goal: "No person and no place left behind"





2024 sees new leadership, membership & staff in A.I.S.E.



2024 sees many changes in the leadership of our European trade association. After 19 years at the helm, Susanne Zänker hands the reins of A.I.S.E. to Alexis Van Maercke

A.I.S.E. press release



Meet the A.I.S.E. Team



Florian Vernay (Unilever) succeeds Nadia Viva (P&G) as President of A.I.S.E. at the 2024 General Assembly

A.I.S.E. press release



In line with the change in presidency, the composition of the A.I.S.E. Board is adapted at the annual General Assembly. **Current A.I.S.E. Board members**



In June 2024, membership grew to 29 national associations across Europe, 19 corporate members and 23 value chain partners.

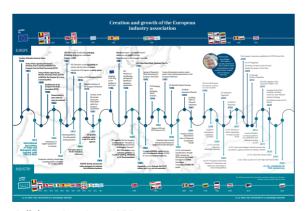
A.I.S.E. members



Working together for over 70 years

The history of a sustainable industry

In June 2023, A.I.S.E. celebrated its 70th anniversary. Since its establishment in 1952, A.I.S.E. has grown from a handful of associations collaborating to secure the availability of materials post-war — into a pan-European organisation representing over 900 companies across over 30 markets. A.I.S.E. owes its existence to a few visionary individuals committed to developing trade and free movement in post-war Europe through an industry organisation that would speak with one common voice for the European soap and detergents industry.



Collaboration since 1952



A.I.S.E. hosts the global network of international cleaning associations (INCPA) at its annual general assembly in Brussels. Congratulations to INCPA on its 20th anniversary!

A.I.S.E. actively represents the sector and exchanges views at pertinent industry events



Cindy Chhuon and Jan Robinson present a regulatory update at the Chemical Watch conference



Susanne Zänker and Giulia Sebastio attend the World Surfactant Congress, Rome



Susanne Zänker speaks of the impact of the EU Green Deal on our sector at CMS Berlin



Jan Robinson joins industry experts to discuss the impact of the revision of REACH at NCEC's 50th anniversary



Sascha Nissen engages with visitors and spoke on A.I.S.E.'s CLP work at Sepawa Congress



Jan Robinson participates in the annual conference of the European Partnership for Alternative Approaches to Animal Testing (EPAA)



A.I.S.E. participates in the EAPPCT congress, May 2023



Sascha Nissen presents the European business perspective at AOSDAC's Mumbai conference online, Oct 23

A.I.S.E. actively represents the sector and exchanges views at pertinent industry events



Elodie Cazelle speaks at Chemical Watch's Biocides Europe 2023 conference



Jan Robinson participates in ACI's annual conference and parallel INCPA meetings



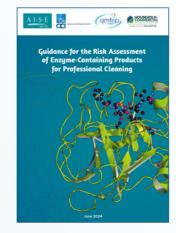
A.I.S.E.'s Jan Robinson presents the industry's work on polymer biodegradation at SETAC Europe, Dublin



Alexis Van Maercke presents A.I.S.E.'s priorities at Interclean, Amsterdam



At the Helsinki Chemicals Forum April 2024, A.I.S.E. contributes a poster on alternatives to animal testing



At the International Occupational Hygiene Association (IOHA) Conference, the industry presents its joint guidance on enzymes, Dublin, June 2024



Julie Janssis
presents the current
state of play of
the revision of
the Detergents
Regulation to
EuroCommerce

The A.I.S.E. Secretariat engages with its network of national associations and member companies



A.I.S.E. visits RUCODEM in Bucharest, Romania



A.I.S.E.'s outgoing and incoming Directors General visit Henkel in Germany



KoBH hosts A.I.S.E.'s National Association Committee (NAC) meeting in Copenhagen, Denmark



A.I.S.E team visit Diversey and their customers in the Netherlands, focussing on the PC&H sector



A.I.S.E. visits its newest member association BNAEOPC in Sofia, Bulgaria



A.I.S.E. visits KOZMOS regional meeting in Visegrad Hungary



A.I.S.E. joins celebrations for NVZ's 75th anniversary in Utrecht, The Netherlands

The A.I.S.E. Secretariat engages with its network of national associations and member companies



Sascha Nissen speaks at IKW's annual meeting in Frankfurt Germany



A.I.S.E. team visits P&G in Brussels, Belgium



A.I.S.E. team visit Dow's innovation centre in Seneffe, Belgium



A.I.S.E. presents the industry's journey of sustainability at KTSD's annual conference in Istanbul, Turkey



A.I.S.E. + Cosmetics Europe visit KOZMODET, Serbia



A.I.S.E. team visit Ecolab in Monheim, Germany



Alexis Van Maercke participates in Assocasa General Assembly, Italy