Association Internationale de la Savonnerie, de la Détergence et des Produits d'Entretien
International Association for Soaps, Detergents and Maintenance Products

DETERGENTS AND MAINTENANCE PRODUCTS VOLUNTARY INDUSTRY INITIATIVE ON PLASTIC PACKAGING

Supporting the EU Strategy for Plastics in a Circular Economy with focus on boosting the uptake of recycled plastics material

(1 JANUARY 2019)

I. Introduction

A.I.S.E., the International Association for Soaps, Detergents, and Maintenance Products supports the objectives of the European Strategy for Plastics in a Circular Economy. The industry is committed to play its part and to contribute positively to the challenges identified via a voluntary industry initiative on packaging, addressing the European Commission's intention to boost the uptake of recycled plastics material.

In the last 20 years, A.I.S.E. has actively worked with its members on their efforts to reduce the footprint of cleaning and maintenance products at all stages of the products life cycle, by developing and promoting voluntary initiatives encompassing sustainable production, design and consumption.

A.I.S.E. has developed this voluntary industry initiative on plastic packaging to provide a framework for companies active in the household cleaning and maintenance products sector to respond to the call for action in the context of the EU Plastic Strategy[1].

Although this industry initiative is launched and coordinated by A.I.S.E., it is the individual participating companies – and not A.I.S.E. as an industry association – that will commit to achieving the targets as listed below. Company participation is on a voluntary basis.

This document provides the details of this voluntary industry initiative.

II. Product Scope

This initiative covers plastic packaging material used by the signatories for the household cleaning and maintenance products which:

a. fall into the remit of the A.I.S.E. activities and
b. are manufactured and/or placed on the market within the geographical scope defined under point III.

This means that products are covered if they:

- Are manufactured and placed on the market within the geographical scope, or
- Are manufactured but not placed on the market within the geographical scope, or
- Are manufactured outside the geographical scope but placed on the market within the geographical scope.

[1] https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1516265440535&uri=COM:2018:28:FIN

This means that the initiative addresses:

- manufacturers, distributors or importers where applicable as both branded products and private labels are covered. Participating companies shall sign up for the Products' brands they own. In case of private label, the distributor shall sign the Letter of Commitment for his own brands only. On the contrary a company manufacturing private label products shall not sign up for the products they manufacture on behalf of a distributor.
- companies established within or outside the *Territory*;

The commitments apply to primary, secondary and tertiary packaging.

III. Geographical and participants scope

This industry initiative is open to all companies, whether they are members of A.I.S.E., its National Association members or not, manufacturing and/or placing on the market detergents, cleaning and maintenance products in the EU plus Iceland, Liechtenstein, Norway, UK (post-Brexit) and Switzerland.

The participation to this initiative is purely voluntary.

IV. Timing

The initiative will open for signatures on 1 January 2019. This means that companies may sign their commitment to A.I.S.E. as of this date.
The project is scheduled to end on 30 June 2026.
Companies will be free to join at any time between 1 January 2019 and 30 June 2026[2].

V. Company Commitment

Companies commitment when joining the initiative is threefold. It includes:

- Quantitative targets;
- Annual reporting of progress to A.I.S.E.;
- Further engagement with consumers.

The details of the commitment per each one of these items are explained in paragraphs a.-c.

a. Quantitative targets

The Companies signing up to this initiative shall commit to reach the following targets by 2025 for their products falling into the product scope of this initiative (hereinafter "Products") as defined under II:

- ***a minimum average of 20% uptake in volume of recycled plastics material of the Company's Products plastic packaging, and***

- ***the intention to have ALL the Products plastic packaging recyclable or reusable or compostable.***

The definitions of "recycled material", "recyclable packaging", "reusable packaging" and "compostable packaging" are provided in the Appendix 1 to this Project Description.

[2] The last KPI reporting will take place by 1 April 2026. Joining the initiative after that date will mean that the quantitative contribution of that signatory will not be accounted for in the overall figures consolidated by A.I.S.E.

Applicable to the companies that are also members of the A.I.S.E. Charter for Sustainable Cleaning

As of 2021: 100% of the packaging must be recyclable or reusable or compostable in order to meet the requirements for the A.I.S.E. Charter for Sustainable Cleaning product dimension ASP (Advanced Sustainability Profiles) with the intention to cover the whole A.I.S.E. household product range in the remit of its activities by 2025[3]. The individual product category ASP criteria will be amended accordingly, incl. a transition period for implementation.

N.B.

It should be noted that composting can take place in an industrial facility, following a controlled process managed by professionals, as well as in a collective or at home, where the process is subject to the householder's skills and other environmental conditions. The terms 'composting' and 'compostable' as referred to in this chapter refers to industrial composting.

At the time of preparation of this commitment, the main known applications for compostable plastic packaging material are related to use as food packaging rather than for the detergent sector.

The inclusion of this option as part of this initiative is, therefore, mainly aspirational for the time being. This is to ensure the maximum inclusiveness, both of businesses and products types, openness to future research and innovation and potential opportunities triggered in this regard by the recent update of the EU Bioeconomy strategy[4], which aims at implementing a circular bioeconomy.

In case a company would wish to already make use of such option to achieve the targets part of this commitment, it will be its responsibility to verify whether this application is allowed by national legislation and if a dedicated collection scheme exists in the country where the product is placed on the market, but also to assess the risk that product-leftovers might have on industrial composting sites – especially for primary packaging - and to inform consumers accordingly on proper disposal.

Moreover, it will be part of A.I.S.E. tasks after the launch of this initiative to engage with experts in this field to get further insights on the relevance of maintaining this option as part of the commitment. The KPI reporting can help to assess penetration in the market and/or relevance of such application.

The feasibility and the successful implementation of the actions required in the context of this initiative to achieve the targets part of the commitment is subject to specific conditions. Please refer to the following paragraphs of this document for more details on the framework needed for a successful deployment.

b. Annual reporting and close-out report

Signatories shall provide data on a yearly basis to enable A.I.S.E. to monitor and report annually on progress as regard to the quantitative targets listed hereof. Those include:

- Volume of packaging material;
- Volume of plastic packaging material + fraction of recycled plastic packaging material;
- Volume of recyclable or reusable or compostable plastics packaging material.

For private label products, the reporting may be done by the Company's Products manufacturer.

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[3] https://www.aise.eu/our-activities/sustainable-cleaning-78.aspx

[4] https://ec.europa.eu/research/bioeconomy/pdf/ec_bioeconomy_strategy_2018.pdf#view=fit&pagemode=none

The Basis data for 2018 shall be provided by the A.I.S.E. Secretariat by 15 April 2019 via a template. They will serve as a benchmark to monitor the progress made by the signatories throughout the project.
The data for the time period 2019 – 2025 shall be reported via the Charter KPI tool by 1 April each year.
All data will be collected and handled under strict confidentiality and in compliance with EU competition rules. No individual company data will be disclosed, only aggregated data in a way which preserves confidentiality. Aggregated figures might be used by A.I.S.E. as part of its corporate communications, e.g. as part of the annual activity and Sustainability Report.

At the end of the project, A.I.S.E. will publish a close-out report presenting the aggregated results achieved by the participants altogether.

N.B. *companies wishing to commit to this initiative are not required to be a Charter member even though the reporting will be done as of 2020 via the Charter KPI tool.*

c. Further engagement of consumers

Companies committing to this initiative will strive to further engage consumers by providing information – on products and/or online – on the correct way to handle the plastic packaging.
The practical way in which this will be implemented is left to each individual signatory due to the specificity of the requirements, both geographically and per product types. In fact, different provisions might need to be put in place for a correct packaging handling and disposal depending on the local existing legislation and on the type of packaging.

d. Guidance to help reach the quantitative targets

In support of the quantitative targets part of the commitment, A.I.S.E. will provide guiding principles on sustainable packaging design to companies in the industry sector, in order to improve the recyclability of packaging. The guidance will be issued by the end of Q1 2019.

The principles detailed in this guidance will not have to be implemented mandatorily by companies as part of the commitment to this initiative. The guiding principles will be a tool to help companies in the detergents sector to achieve higher targets for the recyclability of their plastic packaging, especially for the SMEs, even outside the scope of this initiative.

VI. Project Governance

a. Project coordination

The role of A.I.S.E. will be to i) facilitate and encourage companies to sign up, ii) consolidate sector information to monitor and report on progress, iii) monitor and inform stakeholders of the aggregated companies' achievements and iv) based on the outcome of the annual monitoring, to develop any additional guidance where deemed necessary.

The A.I.S.E. Secretariat will manage these tasks, liaising with its internal experts' task forces as needed and reporting ultimately to the A.I.S.E. Board.

It will be up to each signatory of the commitment to decide the most effective way to manage the internal tasks required to achieve the targets part of this commitment and to report the required data to A.I.S.E. on an annual basis.

b. Visibility and dissemination

A.I.S.E. will make use of its existing reporting tools and activities, i.e. websites, Activity and Sustainability annual report, newsletters, its statutory events and public speaking slots to disseminate the achievements related to this project.

Any need to consider additional dedicated visibility and dissemination will be discussed and agreed upon by the relevant A.I.S.E. decisional bodies. National Associations will contribute to this visibility and dissemination at their national level, taking advantage of local opportunities and of their network.

Whilst National Associations are not expected to formally commit to the initiative nor to report specific data annually, there is a clear facilitation and engagement role for them to maximize uptake and success.

c. Financing

A.I.S.E. will finance via its internal resources all the expenses needed for its Secretariat to deliver on the listed tasks, i.e. project management, reporting, communications.
No fee is required by the signatories when committing to this initiative.
The budget for any additional activity not currently envisaged, which might be needed by A.I.S.E. to deliver effectively on the tasks above, will be estimated *ad hoc* and discussed separately.

VII. Conditions and barriers at European level for successful deployment

As anticipated in pervious paragraphs, some conditions at market level are needed for the actors in the detergent sector supporting this initiative to successfully deploy the targets part of the commitment.
It has to be noted that most of the requirements listed in this paragraph are common to industry as a whole and not specific for the detergents sector. A clear overview of the needs for industry to deliver impactful initiatives at EU level is given by the European Organization for Packaging and the Environment (EUROPEN) in its paper on 'Key framework Conditions for Voluntary Pledges on Recycled Content for Plastics'.

Technical market requirements
In order to reach the targets listed under I., it is essential to have sufficient:

- Material availability, meaning that high quality recycled plastics material has to be available in sufficient quantities to all market players;
- Material quality, meaning thatthe consistency of quality is guaranteed by recycled plastics material producers to ensure performance up to the industry standards;
- Material sourcing, meaning that good quality recycled plastics material is available from credible sources of supply.

The need to include such requirements comes also from the fact that - at the current state of the art - recycling technologies mostly rely on mechanical recycling. Therefore, a sufficient quality of recycled plastics material on the market is guaranteed only when the average maximum level of recycled plastics material in packaging on the market is kept below a certain threshold. More technical details in this regard will be included in the A.I.S.E. guiding principles on sustainable packaging design.

A.I.S.E. is committed to work with plastics packaging value chain partners on finding solutions to improve the quality of recycled plastics material. A.I.S.E. notes that the success of the commitment will also be highly dependent on the cost of recycled plastics material compared to the one of virgin plastics material. This will be influenced by the fact that the essential market requirements listed above will come into place.

Overall policy framework
In addition to the technical requirements listed above under the '*technical market requirements*', some barriers potentially hindering the objective to boost the uptake of recycled plastics material have been identified in the infrastructure supporting the industry

operations. To overcome those barriers A.I.S.E. suggests that stakeholders cooperate on the following:

- Harmonisation

The collection systems across member states (MSs) are better harmonised to ensure availability and quality of secondary raw materials and that there are no limits on cross-border shipments; the Extended Producer Responsibility (EPR) schemes and fees in the EU are better harmonised as well: incentive systems can push by providing a bonus for recycling friendly packaging and usage of recycled content. EPR fees and bonus should be based on material classifications linked to its recyclability and use of recycled material that has proven to be environmental beneficial, based on life-cycle assessment (LCA). The European Commission is encouraged to look into national systems that successfully work today (high collection rates at low cost, transparent, etc.) and recommend applying their basic principles;

- Consumer engagement

Consumers in Europe are further educated in order to collect and sort correctly; harmonised recycling labelling on packs (like the 'How to recycle label' in the US) might make sense for consumers and waste manufacturers in case harmonised collection becomes a reality. Collection systems must be straightforward and not too complex for consumers;

- No conflicting legislation

There are no conflicting current and future legislations; for instance, the current Classification, Labelling and Packaging (CLP) Regulation requirements are more conservative than in the past. This results in over classification, as proven by the fact that many products previously classified as 'irritants' are now classified as 'corrosive' even if the product formulation has not changed. If this is the basis to consider a product as 'hazardous' according to the Waste Framework Directive (WFD), then this may necessitate separate collection. Note: a positive example are the Fost-Plus triage guidelines to householders (www.fostplus.be).

- Innovation friendliness

New sorting and recycling technology are made available to treat innovative packaging solution, existing packaging solutions that are currently non or hard to recycle and to produce broadly usable recycled material.

A.I.S.E. is committed to work with policy makers and with infrastructure providers on finding solutions to deliver a more holistic and consistent framework for industry to operate. This will require efforts both at EU and national level, which A.I.S.E. is keen to support via its network of national associations.

Appendix 1: Definitions

At the time of preparation of this commitment some of the key concepts that are being discussed lack a harmonized definition at European level or a standardized approach to the measurement of progress. Instead, there is a proliferation of segmented definitions and methodologies that are perhaps applicable solely to certain sectors and/or applications.
A.I.S.E. is committed to participate in future discussions at EU level to help refine concepts such as 'recyclability' but also to develop a common framework to measure the success of parallel on-going initiatives.
In the context of this A.I.S.E. voluntary initiative on plastic packaging the following definitions and technical clarifications shall be considered:

Recycled material

Recycled material is defined as waste recycled after use, including:

- material from post-consumer waste, collected via official collection schemes;
- material from outside existing collection streams, such as maritime litter, beach litter, etc.;
- 'post-industrial recycled' material, i.e. material from post-industrial sources; this does not include material from own processes which has been reused/recycled, such as regrind.

Recyclable packaging

The definition for 'recyclable packaging' used in this A.I.S.E. initiative is the one from the Ellen MacArthur Foundation New Plastics Economy Global Commitment[5] together with its clarification notes, i.e.:
A packaging or packaging component is recyclable if its successful post-consumer collection, sorting, and recycling is proven to work in practice and at scale.

Notes
1. In the context of a 2025 timeframe and the Global Commitment, a package can be considered recyclable if its main packaging components, together representing >95% of the entire packaging weight, are recyclable according to the above definition, and if the remaining minor components are compatible with the recycling process and do not hinder the recyclability of the main components. Otherwise, only the recyclable components of a package (or the recyclable parts of components - see footnote 3) can be counted towards achieving this commitment, and only when other components do not hinder or contaminate their recyclability.

Examples:

- If a bottle and its cap are recyclable, the packaging can be claimed to be recyclable if it has a label (<5% of total weight) that does not hinder the recyclability of the bottle and cap.
- If that same bottle has a label that hinders or contaminates the recycling of the bottle and cap, the entire packaging is non-recyclable.
- If a package has (a) certain component(s) that are not recyclable and that make up >5% of the total packaging weight (e.g. 12%) and that do not hinder or contaminate the recycling of the remaining recyclable components of the package, then only that recyclable part (e.g. 88%) can be counted towards this commitment.

Longer-term, the aim should be for all packaging components (e.g. including labels) to be recyclable according to the above definition.
2. A packaging component is a part of packaging that can be separated by hand or by using simple physical means (ISO 18601), e.g. a cap, a lid and (non in-mould) labels.
3. A packaging component can only be considered recyclable if that entire component, excluding minor incidental constituents (6), is recyclable according to the definition above. If

[5] https://newplasticseconomy.org/assets/doc/global-commitment-download.pdf

just one material of a multi-material component is recyclable, one can only claim recyclability of that material, not of the component as a whole (in line with US FTC Green Guides and ISO 14021).
4. ISO 14021 defines post-consumer material as material generated by households or by commercial, industrial and institutional facilities in their role as end users of the product which can no longer be used for its intended purpose. This includes returns of material from the distribution chain. It excludes pre-consumer material (e.g. production scrap).
5. Packaging for which the only proven way of recycling is recycling into applications that do not allow any further use-cycles (e.g. plastics-to-roads) cannot be considered 'recyclable packaging'.
6. ISO 18601:2013: A packaging constituent is a part from which packaging or its components are made and which cannot be separated by hand or by using simple physical means (e.g. a layer of a multi-layered pack or an in-mould label).

The 'recyclable' definition above applies at a global level for global commitments: it is a characteristic of packaging and is not linked to any local context or specific geographical area. As such, this definition does not apply to claims linked to specific geographical areas (e.g. on-pack recycling labels, customer communications), as these should always take into account the local context and systems in place (in line with ISO 14021 and US FTC) and be in line with the local regulations that apply to such claims.

Reusable packaging

The definition for 'reusable packaging' used in this A.I.S.E. initiative is the one from the Ellen MacArthur Foundation New Plastics Economy Global Commitment together with its clarification notes, i.e.:

Packaging which has been designed to accomplish or proves its ability to accomplish a minimum number of trips or rotations in a system for reuse.
Source: ISO 18603:2013 - Packaging and the environment - Reuse, modified (packaging component mentioned in notes)

Notes
1. A trip is defined as transfer of packaging, from filling/loading to emptying/unloading. A rotation is defined as a cycle undergone by reusable packaging from filling/loading to filling/loading (ISO 18603).
2. The minimum number of trips or rotations refers to the fact that the 'system for reuse' in place should be proven to work in practice, i.e. that a significant share of the package is actually reused (measured e.g. by an average reuse rate or an average number of use-cycles per package).
3. A system for reuse is defined as established arrangements (organisational, technical or financial) which ensure the possibility of reuse, in closed-loop, open-loop or in a hybrid system (ISO 18603).
4. See above for the definition of reuse, which stresses amongst other things the need for the packaging to be refilled or used again for the same purpose for which it was conceived.

Compostable packaging

The definition for 'compostable packaging' used in this A.I.S.E. initiative is the one from the Ellen MacArthur Foundation New Plastics Economy Global Commitment together with its clarification notes, i.e.:

A packaging or packaging component is compostable if it is in compliance with relevant international compostability standards and if its successful post-consumer collection, (sorting), and composting is proven to work in practice and at scale.

Notes
1. ISO 18601:2013: A packaging component is a part of packaging that can be separated by hand or by using simple physical means (e.g. a cap, a lid and (non in-mould) labels).
2. Including ISO 18606, ISO 14021, EN13432, ASTM D-6400 and AS4736.
3. ISO 14021's usage of term clarifies post-consumer material as material generated by households or by commercial, industrial and institutional facilities in their role as end users of the product which can no longer be used for its intended purpose. This includes returns of material from the distribution chain.

It should be noted that composting can take place in an industrial facility, following a controlled process managed by professionals, as well as in a collective or at home, where the process is subject to the householder's skills and other environmental conditions. The terms 'composting' and 'compostable' as referred to in this appendix refer to industrial composting.