

A.I.S.E.'s position on the 'Sustainable Products Initiative'

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A.I.S.E., the European association representing the detergents and maintenance products industry, welcomes the objectives of the European Commission's Circular Economy Action Plan 2.0 (CEAP): "For a cleaner and more competitive Europe", and in this context the 'Sustainable Products Initiative' and the work towards making sustainable products the norm. A.I.S.E. welcomes the consideration of a holistic approach towards sustainability, including social, environmental, and economic aspects, as well as using the unexploited potential of digitalisation.

In this context, we wish to highlight the importance of ensuring a coherent and legally sound legislative framework that is supported by a science-based approach, taking into consideration the impacts across the full life cycle of the product and its packaging, as well as solid impact assessments. This will guarantee that the functionality of our products and packaging materials can be maintained for the safety of citizens, the environment, and businesses. Moreover, in an evolving legal environment with several existing pieces of EU legislation planned to be reviewed and new legislative initiatives to be adopted, certainty, predictability, and workability of the legal framework needs to be ensured during all phases of the legislative process, as well as for secondary legislation and guidelines, through the proper application of the Better Regulation principles. This is of paramount importance to guarantee business operations. A well-functioning EU Single Market, allowing free movement of products, should be preserved in order to stimulate the competitiveness of EU industry. To this end, it is essential that EU legislation is harmonised, holistic and inclusive, also providing flexibility for future innovative technologies.

A.I.S.E.'s experience with industry voluntary initiatives clearly indicates that these should be considered as part of the sustainable product framework, as many have proven to bring meaningful and measurable improvements towards the sustainable development of our sector.

- **Widening scope of Ecodesign Directive**

The extension of the scope of the Eco-design Directive should not be considered for detergents and maintenance products as they already follow their own regulatory framework, and are not meant to be repaired, renewed or replaced.

- **Sustainability principles**

The establishment of sustainability principles should support circularity and, at the same time, clarify potential applicability of these principles. For the moment, the scope and applicability of the SPI remains to be clarified for our sector. In this context, we would like to highlight that, if by sustainability principles, "reuse, repair, remanufacturing and recycling" are meant, our industry sector is not in scope for the product dimension. Our products are already subject to extensive legislation, such as the Detergents Regulation, REACH, CLP and Biocidal Products Regulation. With regard to the reuse and recyclability dimension, our industry sector would be potentially in scope for the packaging; though for this, it is suggested to have an alignment with the Packaging and Packaging Waste Directive, planned to be reviewed soon. This is in line with the conclusion of the European Commission's previous initiative on sustainable products from March 2019¹,

¹ https://ec.europa.eu/environment/circular-economy/pdf/sustainable_products_circular_economy.pdf

where detergents were not identified as an important area of improvement for environmental “gains” and closing the loop on Circular Economy.

Regarding the concept of a ‘harmonised method’, it should be considered that there is no ‘one method fits all’ approach, especially since our industry sector comprises a great diversity of products. Whereas there may be some space for overall horizontal rules, further granularity may be considered per industry sector. For sustainability principles addressing social aspects, A.I.S.E. suggests not to cover these throughout the product lifecycle, but to integrate CSR into company policies instead – which is common practice in our industry sector. A.I.S.E. has issued a specific ‘Social Responsibility Guidance’ as well as an impact assessment tool².

A.I.S.E. suggests considering industry voluntary initiatives or self-regulation as an effective approach to demonstrate compliance with product sustainability principles, given that self-regulation and voluntary initiatives have resulted in major and measurable environmental improvements. Good examples for our industry sector are the Charter for Sustainable Cleaning³, industry compaction projects⁴, A.I.S.E.’s initiative on plastic packaging⁵, and consumer engagement campaigns aimed at educating consumers on best cleaning practices⁶. These have contributed significantly to policy objectives, which are being addressed via the Green Deal. A.I.S.E. is open to initiating a dialogue with the Commission (and other stakeholders) to develop common, measurable sustainability goals that the industry will bring to life via existing or new voluntary initiatives.



- **Digital product passport**

A.I.S.E. has run initiatives and consumer surveys⁷ demonstrating the need to further optimise product labels and information through digitalisation. To this end, online tools should be exploited, supporting the increased interest of consumers to gain more product information, as well as catering to the continuous decreasing space available on packaging. This is in line with findings from studies of the European Commission, who is currently following-up on this work⁸. We suggest aligning the work on the Digital Product Passport with the related work following the CLP fitness check, and the currently on-going study on hazard information and e-labelling.

For information shared in the supply chain for the safe use of chemicals, the REACH regulation already provides an extensive framework and set of requirements, to which further additions are proposed in the Inception Impact Assessment for revision of REACH (e.g. inclusion of information on environmental impact in registration dossiers, and harmonised electronic formats for safety data sheets). For chemical products we would therefore encourage the centralisation of requirements under REACH, including the Digital Product Passport if this would be considered in future for these products. Moreover, for articles, including detergent product packaging, the introduction of digital product passports to track the sustainability impacts of products should be compatible with and incorporate existing digital tools, such as the SCIP database for Substances

² www.aise.eu/csr

³ <https://www.aise.eu/our-activities/sustainable-cleaning-78/charter-kpi-reporting.aspx>

⁴ https://www.aise.eu/documents/document/20190410111600-aise_factsheet-2019_compaction_def.pdf

⁵ <https://www.aise.eu/our-activities/sustainable-cleaning-78/circular-economy/packaging-2222/voluntary-industry-initiative.aspx>

⁶ <https://www.aise.eu/our-activities/sustainable-cleaning-78/engaging-with-consumers.aspx>

⁷ <https://www.aise.eu/our-activities/information-to-end-users/consumer-research.aspx>

⁸ <https://op.europa.eu/en/publication-detail/-/publication/7e26e205-18f9-11e7-808e-01aa75ed71a1>

of Very High Concern. Furthermore, it should be clearly defined which characteristics a digital product passport entails, in line with existing provisions, and taking into account the respective sectorial approaches.

As the topic related to the substantiation of environmental claims via PEF has also come up in the context of digital product passports, A.I.S.E. would like to point out that this needs to be carefully assessed. PEF has a long-term potential but, in its current form, the methodology is not yet sufficiently mature for product-to-product comparisons and does not help substantiate certain environmental claims, which are not covered by the lifecycle impact categories of the PEF method. At this stage, most of the recommended PEF methods lack the scientific robustness for this purpose. Hence, also, sound LCA studies and other scientifically robust assessment methods should be taken into account⁹.

- **Increasing recycling and recycled content in packaging**

A.I.S.E. welcomes the consideration to increase recycling and recycled content, as supported in our voluntary pledge. However, should the Commission decide that setting mandatory recycled content targets is essential, they should be set as 'minimum content' that is achievable across a sector. We would like to highlight that, in order to drive progress, we consider it important to overcome current obstacles by harmonising key waste-related definitions such as "recyclability" or "recycled content", and by providing investment support for recycling capacities and technologies.

⁹ www.aise.eu/pef