

# EU ACTION PLAN “TOWARDS A ZERO POLLUTION AMBITION FOR AIR, WATER AND SOIL”

## A.I.S.E. position statement accompanying its response to the public consultation

10 February 2021

A.I.S.E. – the European association representing the detergents and maintenance products industry – welcomes the work initiated by the European Commission to secure clean air, water and soil, healthy ecosystems and a healthy living environment for Europeans. It is clear the EU needs to better prevent, remedy, monitor and report on pollution, bring the zero pollution ambition into the mainstream for all its policy developments and decouple economic growth from the increase of pollution, in line with United Nations driven efforts.

A.I.S.E. calls for measures that are:

- based on **sound science** and in consideration of **impacts across the full life cycle** of the products;
- developed in a **consistent and coherent** way with existing legislation.

This paper aims to provide the detergents industry’s vision and recommendations on the Zero Pollution Action Plan in order to deliver on the objectives of the Green Deal. It accompanies A.I.S.E.’s response to the questionnaire, which is based on the sphere of activity and the interests of its members, namely the European producers of detergents, cleaning and maintenance products. Questions that are not applicable to the sector in Europe as a whole, or for which it is not possible or relevant for A.I.S.E. to take a position, have consequently been answered as “I don’t know” or “no opinion” in the questionnaire, according to availability.

### Views on the state of pollution and related policies

A.I.S.E. emphasises firstly that, to ensure a consistent and harmonised understanding, a **definition** of what constitutes pollution and the stated objective of attaining “zero pollution” may be required. This should take into consideration that the nature, sources, timing, and locations of pollution may vary greatly across Europe. Pollution may be adequately controlled in some areas but not in others, so A.I.S.E. considers that a holistic assessment is necessary to address pollution effectively.

Prevention and waste hierarchy, waste and littering management, polluter-pays-principle, etc. are core principles which are already clearly laid out in EU legislation<sup>1</sup>, and A.I.S.E. supports a thorough **review and evaluation of the existing acquis** to identify where this could be harmonised, strengthened or adapted to technical progress to better achieve the objectives.

Before any decision on new policy measures it is important to **analyse and quantify the effects** of pollution, and also the predicted effects of any planned action, in order to target initiatives appropriately and effectively. Not all measures are legislative in nature, however, and the role

<sup>1</sup> Packaging and Packaging Waste Directive, Waste Framework Directive, Single-use Plastics Directive, Industrial Emissions Directive, REACH Regulation (including restriction proposal on intentionally-added microplastics), Detergents Regulation, NEC Directive, etc.

and effectiveness of existing **voluntary industry initiatives** – such as the A.I.S.E. Product Stewardship Programme on Indoor Air Emissions from Air Fresheners<sup>2</sup>, for example – should also be taken into account.

If, following the thorough evaluation mentioned above, further action on pollution is deemed necessary, A.I.S.E. believes that this is most appropriate on **EU level** (not excluding the importance of involvement and cooperation by all levels of government). Given that the EU comprises a Single Market for goods and services and that pollution can be a trans-Member State boundary issue, A.I.S.E. is strongly in favour of a **harmonised European vision**, with sufficient flexibility to address local variations and concerns and discourage unilateral Member State initiatives, which could lead to fragmentation of the Single Market<sup>3</sup>. In this context A.I.S.E. suggests consideration of adding to Art.192 (1) and Art.192 (2) a joint legal basis based on Art. 114 (internal market) of the Treaty of the Functioning of the European Union (TFEU).

### Ways forward to address pollution

In relation to industrial production and formulated chemical products (such as detergents), as stated above A.I.S.E. believes that the existing legislative framework is adequate, and a focus on **improving and harmonising the implementation and enforcement of existing policy instruments** would generally suffice to deliver the objectives of the Zero Pollution Ambition. 'Modernising' existing EU law should not imply change for its own sake, but rather harmonisation and improved efficiency in line with the principles of Better Regulation. Furthermore greater powers of enforcement or increased penalties would be of limited/no effectiveness if existing powers are not utilised to their full extent, or if the implementation of such powers varies between Member States for the same legislation or type of pollution.

Future actions need to be targeted rather at the '**bigger issues**', namely wide dispersive releases of potential pollutants from daily life and the use and maintenance of articles. Such measures should be based on evidence from existing and ongoing **scientific research**<sup>4</sup> and are likely to require behavioural change on a societal level, meaning this will require the engagement of civil society and governments as well as industry stakeholders. A.I.S.E. recognises an important role for **education** of the general public on pollution and its reduction; this should include factual, evidence-based communication about the science and on the links between pollution and adverse health and environmental effects. A.I.S.E. has always sought to play its part in such education, e.g. through its website [cleanright.eu](https://www.aise.eu), and will continue to do so in future.

Reducing **waste** – preferably at source, in line with the principles of the waste hierarchy<sup>5</sup> – can play an important role in minimising pollution. Revision of the legislative framework should be considered, to include **financial and other incentives** towards this goal. Revenues from industry should be reinvested into infrastructures and technologies to improve collection, sorting and recycling and to recover high quality resources that could otherwise contribute to pollution.

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<sup>2</sup> <https://www.aise.eu/our-activities/product-stewardship-programmes/air-fresheners/aise-product-stewardship-programme-on-indoor-air-emissions-from-air-fresheners-2016.aspx>

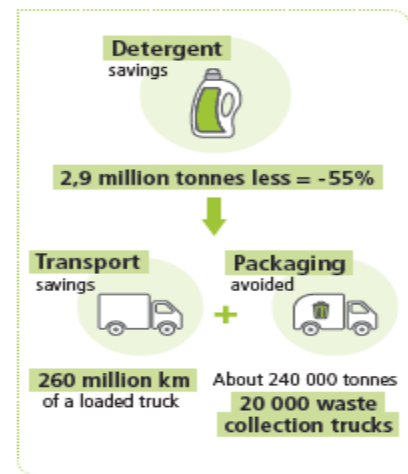
<sup>3</sup> Examples of national legislative developments threatening the integrity of the Single Market for packaging and packaged goods are reported in an [EU packaging value chain position paper](#) on protection of the integrity of the Single Market.

<sup>4</sup> Such as the research supported by the [Cross Industry Agreement](#) for the prevention of microplastic release into the aquatic environment during washing of synthetic textiles

<sup>5</sup> Article 4 of the Waste Framework Directive 2008/98/EC

In this context the value of voluntary industry actions should also be taken into account, as in many cases these are able to achieve policy goals faster and with better results than regulatory measures.

A.I.S.E has a long track record of similar initiatives, such as the **voluntary initiative on compaction for certain household products**, which led to significant reductions in detergents, packaging and transport between 1997 and 2017 (as shown in the figure on the right).<sup>6</sup>



### Towards an integrated zero pollution monitoring and outlook framework

In the absence of a clear definition of what constitutes “(zero) pollution”, as already mentioned above, it is difficult today to judge the adequacy of existing pollution monitoring frameworks. However as already mentioned above, A.I.S.E. considers a clear, harmonised vision and framework on EU level, supported by good quantitative data and analytics, to represent the optimal way forward.

### Digital solutions for zero pollution

A.I.S.E. has experience in conducting initiatives and research into the potential for digital communication to consumers/end users. Consumers are actively looking for more information about products (including their environmental impact and sustainable use), besides the increasing requirements for regulatory information. At the same time, the space available to communicate this information on-pack decreases due to product compaction and packaging reduction in our industry sector.

Digitalisation, provided it follows the principles of transparency, can enable consumers to access relevant information about the product and its use online when label space is limited or even absent. A.I.S.E. has been conducting pan-European consumer surveys<sup>7</sup> and its findings demonstrate the need for further optimisation of product labels and to move towards digital tools for supplementary information. Digitalisation can offer additional benefits such as direct access to a wider range of languages, customisation of the information retrieved, etc. A.I.S.E. believes that digital solutions for end-user communication could make a meaningful contribution to pollution prevention/reduction by influencing behaviours.

A.I.S.E. is committed to continuing to work constructively and proactively with its members and its value chain on these priorities and to contributing to the aims of the EU Green Deal.

<sup>6</sup> Source: [A.I.S.E. Factsheet on Compaction of Household Laundry Detergents](#)

<sup>7</sup> [www.aise.eu/our-activities/information-to-end-users/consumer-research.aspx](http://www.aise.eu/our-activities/information-to-end-users/consumer-research.aspx)