

POLISH ASSOCIATION OF COSMETIC AND DETERGENT INDUSTRY SUMMARY OF THE ACTIVITIES IN PANDEMIC CRISIS

Official recommendations for a pandemic crisis regarding the role of hygiene in COVID-19 prevention have a sharp impact on the market demand.

According to Nielsen's data, during last week of March antibacterial gels recorded an increase in sales of 2000% and it could be probably more if the products were available in the shops.

Nobody doubts today that regular availability of personal hygiene products, disinfectants, cleaning products and detergents is a matter of the highest importance.



THE ASSOCIATION'S CURRENT TASKS AND TARGETS:

- **FIGHT AGAINST COVID-19**
- **Support for Member Companies** by providing them with up-to-date legal and technical information
- **Identification of the main barriers and difficulties** that entrepreneurs in cosmetic and detergent industry face
- **Common voice of cosmetic and detergent industry** in the process of law making during the pandemic crisis
- **Proposals for legal changes to ensure continuity of production** availability of products necessary to counteract the coronavirus pandemic



HOW WE REACH OUR GOALS:

- **Direct and regular contacts with the Polish government and legal authorities**
- **Active engagement of Member Companies in the consultation process and at the stage of developing proposals for changes**
- **Partnership with the Union of Entrepreneurs and Employers**



MAIN SUCCESSES:

▶ **Export restrictions for cosmetics & disinfectants completely lifted**

Following the introduction of the state of epidemic and the export restrictions, many efficiently functioning companies began to struggle with operational problems and huge export challenges which stopped products from being delivered to other EU Member States. Due to broad interpretation of the definition of sanitizer - many products of strategic importance for the fight against COVID-19

were held at the Polish borders.

Immediate Association's respond and close co-operation with decision makers in the Ministry of Health and Ministry of Development resulted in legislative changes in narrowing the definition and exclusion of cosmetics from the scope of the definition. This was the desired direction of change, however the export procedures for

sensitizers remained a challenge.

Further intensive work and constructive discussions with the Ministry of Health resulted in a complete withdrawal of the export restrictions for disinfectants. This definitely solved the problem for export of cosmetics and products classified as disinfectants and restores the smooth flow of these products on the EU market.

▶ **Working of the production lines became more flexible**

Frequent changes in the legal environment require careful monitoring and prompt response. The immediate intervention of the Association enabled significant changes to be made prior to publication of the regulation on restric-

tions related to the COVID-19 epidemic.

The key change was related to ensuring a strictly defined distance between workers also on production lines - at least 1.5 m. Due to the fact that in some

production areas it is impossible to keep the distance of 1.5 meters, the Association proposed an alternative solution i.e. where it is not possible to maintain the required distance, **the personal protective equipment** should be used.

▶ **Fast track registration of disinfectant biocidal products**

From the first days of pandemic we strongly recommended the Office for Registration of Medicinal Products, Medicinal Devices and Biocidal Products to implement the fast track registration procedure for disinfectants. The procedure allows to obtain authorization for up to 180 days with minimal requirements for active substances, suppliers and proof of effectiveness. The application

is also free of charge and is being dealt with urgently.

Authorization for a biocidal product according to the national procedure (registration under the transitional regime) is issued within six months after submitting a set of documents. However, if it is necessary to complete the documentation or provide additional explanations,

the period is extended due to the suspension of the procedure until the complete documentation is submitted. So far it was the only method of registration under national conditions.

Many Association's Members are currently using the fast track procedure however they have also experience in regular registration.

▶ **Additional ethanol denaturates for biocidal products**

Due to ethanol shortage caused by the increased demand for alcohol-based disinfection products, the Association was in close contact with the Authorities and submitted proposals for legislative simplifications for the duration of the epidemic. This resulted

in introduction of a temporary exemption from excise duty on ethyl alcohol for the production of biocidal products for the Material Reserves Agency, the Central Sanitary and Antiepidemic Reserve Base or the Industrial Development Agency. It is also possible

until May 15 to use benzyl alcohol or acetone as denaturants for excise duty exemptions for the production of biocidal products.



ONGOING SUPPORT FOR MEMBER COMPANIES:

► Individual consultations on regulatory and technical issues

The Association provides Member Companies with information on new legal provisions as well as all dynamic changes in the regulatory field. We support and provide our Members with regulatory advice, we share our knowledge and experience. Consultations on biocidal products are provided by the Association's

expert with practical experience in product registration acquired during work in the Office for Registration of Medicinal Products, Medicinal Devices and Biocidal Products.

More than 320 writing consultations and **more than 570** telephone consultations focused on

areas such as: cosmetic / biocide product classification, borderline products, hydroalcoholic gels, ethanol and excise duty exemptions for cosmetics and biocidal products, CDA&PDA, disinfectant products registration, antibacterial and antiviral claims, export restrictions.

► Webinars:

- **"Anti-Crisis Shield" – 21 April 2020** - conducted by legal advisors which provided participants with the most important information on the current shape of public help and tips on how to use effectively the package of solutions prepared for business by the government during the crisis caused by the COVID-19.



- **Fast track registration for biocidal products – 28 April 2020** – webinar conducted by the Association's expert on biocidal products with an extensive experience gained from working in the Office for Registration of Medicinal Products, Medicinal Devices and Biocidal Products.



- **"Cosmetic/biocide borderline products. Cleaning and disinfecting hand gels" – mid May.**

► FSC Certificates

- FSC certificates are being issued by the Association on normal basis. Member Companies obtain it according to their needs in both electronic and printed versions.



PROMOTION OF THE INDUSTRY / SUPPORT FOR THE MINISTRY OF DEVELOPMENT AND MINISTRY OF HEALTH

- The Ministry of Development is currently preparing different scenarios for COVID-19 crisis management. We support the Ministry with collecting data from cosmetic and detergent industry. The Association has prepared information on companies' supply chains for future analysis in the decision making process and crisis management on the state level.
- Upon a request of Ministry of Health we have identified manufacturers with sufficient manufacturing capacity and raw materials to produce liquid for disinfection of hands.



WHAT WILL THE FUTURE BRING FOR COMPANIES AND PLANTS IN POLAND?

- Up to date no formal work has been undertaken to restrict the production of specific sectors. As a backup plan our Authorities are working on various crisis management scenarios related to the ongoing epidemic COVID-19 crisis. This tends towards establishing industries, including cosmetics, detergents and biocides and securing their functioning in every situation.
- At the beginning of pandemic we have prepared detailed instruction with safety rules that should be implemented in plants – the instruction was spread among Member Companies to support them in COVID-19 emergency situation.
- The Polish Association in co-operation with the Union of Entrepreneurs and Employers is collecting and sharing best practices regarding safety rules in COVID-19 crisis to develop a set of rules/instruction for a safe workplace – this programme called #returnstowork is to facilitate the safe return to work in various industries.



MEDIA COVERAGE

For over 15 years through the "Science for Beauty" and "Science for Home" programs, we are in regular contact with media and we provide consumers with information on the importance of hygiene in our daily lives, which is crucial during this pandemic.

The Association is doing very

best to provide all the companies with the information on legal changes and requirements in connection with the coronavirus pandemic. We share our knowledge not only among our Member Companies but via the industry media we pass the expertise to non-Members too.

At the moment we perceive society's security as the most precious value.

Articles on legal changes have been published in the most important industry portals:

- **Chemia i Biznes**
- **Biotechnologia**
- **Świat Przemysłu Kosmetycznego**

