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Microplastics Coalition Meeting Summary

DTSC Microplastics Background Document: Cleaning Products

December 12, 2025

Attendees

<i>Name</i>	<i>Organization</i>
Lane Bogar	Fragrance Creators Association (FCA)
Beth Jonas	FCA
Chloe Beaumont-Smith	FCA
Jim Kim	American Cleaning Institute (ACI)
Jamie Logan	ACI
Marie Gargas	ACI
Dan Selechnik	ACI
Freneil Jariwala	Procter & Gamble (P&G)
Amita Kanti	P&G
Mike Prentiss	P&G
Christopher Finarelli	Household and Consumer Products Association
Erin Raden	Consumer Brands Association (CBA)
Ayani Momin	CBA
Will Grassle	CBA
Leticia Garcia	California Retailers Association (CRA)
Sarah Pollo	CRA
Ivy Brittain	Plastics Industry Association
Elizabeth Esquivel	California Manufacturers & Technology Association
Nicole Quinonez	Madden Quiñonez Advocacy
Yash Parulekar	MonoSol Kuraray

Meeting Purpose

- Align on key elements of DTSC’s microplastics background document, with a focus on cleaning products
- Identify priority concerns, data needs, and areas for alignment and coordination
- Discuss approach and next steps for DTSC engagement and written comments

Key Dates

- DTSC comment period closes: January 30, 2026, at 11:59 p.m. PT
- Next coalition meeting: Friday, December 19, 2025, 10:00–11:00 a.m. ET

Topics Discussed

1. Definitions and Scope



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- The lack of a formal definition of microplastics remains a main challenge; “microplastics” has not yet been added to the candidate chemical list, which complicates regulatory clarity; DTSC timeline anticipates potential listing in September 2026
- DTSC has not clearly defined water-insoluble polymers; participants emphasized the need to distinguish among soluble, soluble and biodegradable, and non-soluble polymers
- There is concern that some “natural” or “naturally-derived” alternatives could qualify as water-insoluble polymers under this undefined framework
- Clarification is needed on whether DTSC intends rely on the EU definition of microplastics, and if so, to explicitly address that assumption in our responses and comments

2. DTSC Topics for Feedback

- Naturally derived and biodegradable alternatives:
 - i. DTSC is requesting information on alternatives that are naturally derived and biodegradable.
 - ii. The agreed approach is to respond with science-based explanations, emphasizing that material origin alone does not determine environmental fate, exposure, or risk.
 - iii. Responses should note that some proposed alternatives may still fall within water-insoluble polymer categories and underscore the need for clear definitions.
- Water-insoluble vs. water-soluble polymers:
 - i. DTSC has asked questions related to both water-insoluble and water-soluble polymers.
 - ii. Responses should explain differences in environmental fate, exposure pathways, and risk, particularly for soluble and soluble-biodegradable polymers that behave differently from particulate microplastics.
- Environmental fate and wastewater treatment:
 - i. DTSC is seeking clarity on environmental release and exposure pathways.
 - ii. The group discussed incorporating data on wastewater treatment plant effectiveness, particularly as it relates to soluble and biodegradable polymers.
- Use of EU terminology and assumptions:
 - i. DTSC has referred to the EU approach as a “ban.”
 - ii. Responses should clarify the existence of EU exemptions and derogations and address whether DTSC intends to rely on the EU microplastics definition.
 - iii. The EU Parliament has noted plans to publish additional documentation on microplastics and human health impacts; regulatory positions may change in 2027.
- Overall response approach:
 - i. Comments should directly address DTSC's questions while also correcting underlying assumptions in the background document.
 - ii. Leveraging existing EU and EPA materials will allow for efficient and robust responses.
 1. Potentially obtain AISE comments to the European Commission, EU RAC documentation, and industry submissions on solubility and biodegradability.



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2. EPA's prior support of PVA as biodegradable and dismissal of the Section 21 challenge.

3. Strategy and Coordination

- Given the lack of definition and direction, multiple rounds of comments are anticipated.
- For this initial submission, the agreed approach is to compile and submit as much relevant information as possible; early stages will benefit from multiple aligned submissions with potential consolidation in later phases.
- Ongoing coordination, including weekly calls in January, will continue to maintain alignment and momentum.

4. Next Steps / Action Items

- FCA to coordinate meeting before the holidays and organize weekly meetings in January
- ACI to follow-up to obtain permission to share relevant EU materials and comments
- Identify data gaps, case studies, and subject matter experts (PVA, wastewater treatment, biodegradability assessments)