

**COM/2023/217 Proposal for a Regulation on detergents and surfactants
amending Regulation (EU) 2019/1020 and repealing Regulation (EC)
2019/1020 and repealing Regulation (EC) No 648/2004**

Consultation Response - London Oil Refining Company Ltd

Impact of EU Act

1 Does it appear likely that the proposed EU act would have a significant negative impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist?

Yes

Tell us why :

If the UK does not allow certain EU requirements to be included within UK requirements then certain products will need to have different labelling. This will result in smaller UK FMCG businesses not being able to supply products to Northern Ireland and placing upon both UK and NI distributors logistical obstacles to providing fully complaint products. This will restrict the trade of both UK and NI business and reduce the variety of products in Northern Ireland especially within the value sector therefore raising the cost of living in NI disproportionately to the rest of the UK.

2 Does it appear likely that NOT APPLYING the proposed EU act would have a significant negative impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist?

No

Tell us why:

The availability of supply of value priced household FMCGs from Ireland to the NI is far less than that from the UK. The availability of value choices within this sector will not be affected and there is no infra-structure in Ireland to replace it if it did.

3 Are there any other matters regarding the proposed EU act that you wish to draw to the Committee's attention? Please note, any information provided should be of an evidential nature rather than a commentary.

No

Tell us why :

I have more issues with the UK proposal and failure to allow dual use of the 2 systems.