



Bureaucratic Burdens: Reporting Requirements for Microplastics

Marine litter is a global problem and needs global answers

Most marine litter is generated in Asia and Africa due to the lack of disposal systems and carelessly discarded packaging. Europe can help with its highly developed disposal systems.

No evidence of risk to humans and environment

Microplastics mainly originate from decomposing macroplastics, such as bottles, packaging etc. Only a very small part comes from intentionally added microplastics. There is no scientific evidence of microplastics posing a risk to humans or environment. However, the environment is no place for waste.

ECHA proposal for restricting the use of microplastics

The ECHA proposal concerns only a minor share of microplastics but causes enormous administrative burdens and costs for the paint, coatings and printing ink sector due to extensive annual reporting requirements - without any direct benefit for the environment. Under the proposed provisions, each industrial downstream user and each supplier placing a microplastic on the market for the first time for professional and consumer end uses must provide information on the use and identity of the polymers used, as well as an annual estimate of the release into the environment. This approach ignores the fact that industrial installations are already subject to extensive water protection legislation. Trade, consumers and crafts are exempted from the reporting obligations. Moreover, the rules provide for a labelling requirement to avoid the release of microplastics into the environment.

Massive bureaucracy - without discernible benefit

The proposed restriction will reduce the total release of microplastics into the environment by only 0.2 to 0.6%. This is neither effective nor proportionate. Moreover, the definition of microplastics underlying the proposed restriction is too broad, as it covers almost all polymer-containing substances and mixtures (e.g. binders in paints, coatings and printing inks). Many of them do not end up in the environment as microplastics. In order to meet such reporting requirements, the German paint, coatings and printing ink industry would be faced with costs of at least € 6 million per year.

**This is
what
we are
calling
for**

✓ **Clear-cut definition of the scope of regulation on microplastics**

The ECHA restriction proposal includes a definition of microplastics that is much too broad and leaves much room for interpretation. A more targeted definition of micro-plastics is essential for a workable implementation of rules.

✓ **Avoid extra bureaucratic burdens for companies**

The planned reporting requirements for all industrial users are ineffective and disproportionate. The reporting obligation should only comprise those sectors that manufacture microplastics and place them on the market for the first time.



Hardly any microplastics from paints and coatings

Annually released quantities per person



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