



# Microplastics: Paints, coatings and printing inks under pressure

## Most important source of microplastics is plastic waste

Microplastics mainly originate from decomposing macroplastics, such as bottles, packaging etc. Only a very small part in the environment comes from intentionally added microplastics. Waste prevention and functioning waste management could drastically reduce the amount of plastic in the oceans.

## 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 polymercontaining 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.

## Efforts to regulate non-intentionally added microplastics

In addition, a consultation on non-intentionally released microplastics started in March 2022. This is part of the European Commission's initiative "Environmental Pollution from Microplastics – Actions to Mitigate Environmental Impacts." This initiative assesses microplastics that enter the environment, for example, through crushing or abrasion when a product is used. The focus is on the sources where the highest release of microplastics is expected. Here, in addition to plastic granules and tire abrasion, paints such as facade paints, marine paints and road marking paints are estimated to be a separately considered area in the consultation. So far, it is unclear whether the results of these assessments will lead to specific regulation.

**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.

### ✓ **No additional regulation for unintentionally released microplastics**

Existing legislation also covers unintentionally released microplastics; separate regulation is not necessary for this.



## The components

of paints, coatings and printing inks



### \* Binders

Polymers (plastics) are used as binders in paints, coatings and printing inks. These ensure the formation of a cohesive film by binding the components of the components of the coating to each other and to the substrate. The film formation creates a resistant and durable layer on a wide variety of substrates.



**Aline Rommert**

+49 (0) 69 2556 1705

rommert@vci.de