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 restriction, 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, the identity of the polymers used and an estimate of the environmental impact on an annual basis. Also new is the possibility for enforcement authorities to request further information. In addition, the regulation provides for a labeling obligation to prevent releases of microplastics into the environment. Entry into force of the restriction under REACH is planned for 2023.

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 percent. 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.

Regulation on unintentionally released microplastics is planned

In the framework of the European Commission's initiative "Environmental Pollution from Microplastics – Actions to Mitigate Environmental Impacts" a consultation on unintentionally released microplastics took place in March 2022. 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 considered. The findings of such assessments are expected to result in further regulatory action, although only a rough estimate of the microplastic release is made based on production volumes. The paint and coatings industry are therefore actively engaged in experimental studies to obtain realistic data.

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 microplastics is essential for a workable implementation of rules.

✔ Avoid extra bureaucratic burdens for companies

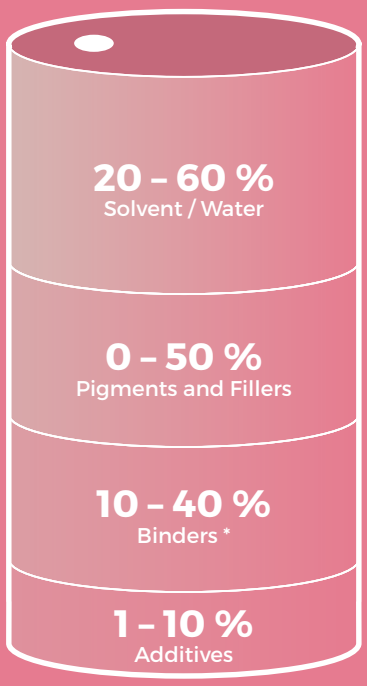
The planned reporting requirements for all industrial users are ineffective and disproportionate. The reporting obligation should only comprise those sectors that manufacture microplastics and place them on the market for the first time.

✔ No additional regulation for unintentionally released microplastics

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

Verband der deutschen Lack- und Druckfarbenindustrie e.V.

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

Verband der deutschen Lack- und Druckfarbenindustrie e.V.
Mainzer Landstraße 55, 60329 Frankfurt am Main
www.WirSindFarbe.de

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