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FEAD feedback on the proposal for a Regulation on preventing plastic pellet losses to reduce microplastic pollution

FEAD, the European Federation for Waste Management and Environmental Services, representing the private waste and resource management industry across Europe **supports the Commission's Proposal for a Regulation to prevent plastic pellet losses and to reduce microplastic pollution** as a supportive tool to reach the objectives of the European Green Deal and to reinforce overarching strategies such as the Plastics Strategy, the Circular Economy Action Plan and the Zero Pollution Action Plan.

As indicated by the Commission in its proposal, plastic pellet losses are, together with paints, tires, textiles, geotextiles, and detergent capsules, sources of unintentional microplastic releases in the environment. **This initiative should raise awareness and streamline handling of plastic pellets, from the prevention to the containment and clean-up, when necessary.** The presence of plastic pellets losses at all supply chain stages, from production to processing, transport and waste management operations can lead to adverse impacts on the environment, climate, potentially human health, and economy.

FEAD believes that the measures referred to in the proposal are rightly aimed at limiting the loss of plastic pellets to as little as possible. Nevertheless, **FEAD also highlights that recycling plants in Europe already work to ensure the management of microplastics in the safest way possible.** For example, there is already detailed national legislation in some Members States¹ and there are already standards² and voluntary schemes³ developed.

Obligations regarding the handling of plastics pellets

FEAD **supports** the introduction of mandatory **risk assessment plans** to be carried out by the economic operators for each installation (Article 4 of the proposal), following the elements detailed in Annex I. Nevertheless, **we stress the importance of the Commission's proposal to take into account the nature and size of the installations as well as the scale of their operations.** This refers, particularly, to the equipment and procedures listed in Annex I, paragraphs 7 and 8, which must stay as an indicative list to be considered when establishing the risk assessment plan. **As there are no 'one-size-fits-all' solutions, the most appropriate equipment and/or procedures will depend on the characteristics of each plant and must be defined by experts and professionals according to their technical feasibility.** Therefore, none should be made compulsory within the course of the ongoing legislative process.

For example, paragraph 8 in Annex I, requires the description of the procedures in place to prevent, contain and clean up spills and losses. Among others, economic operators shall consider limits on the volumes of pellets transported in certain packaging (e.g., pellets must be packaged and sealed in 25 kg sacks and loaded no more than 1 tonne per pallet). When assessing this measure, operators

¹ Décret n° 2021-461 du 16 avril 2021, <https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000043388114>.

² PAS 510:2021 standard on plastic pellets, flakes and powders. Handling and management throughout the supply chain to prevent their leakage to the environment.

³ Operation Clean Sweep (OCS) programme, a European certification scheme.

will also consider that the eventual limit of 1 tonne per pallet will imply using more packaging, increasing thus the packaging waste produced as well as increased fuel consumption and transport-related emissions, as the quantity of material transported on individual vehicles would be significantly reduced.

FEAD reiterates its support to the aim of this proposal, focused on helping preserve ecosystems and biodiversity, decrease potential health impacts and benefit local economic activities. Establishing a detailed risk assessment plan for each installation is essential especially to evaluate the weaknesses in handling plastic pellets. **With the illustration of the example above, FEAD also stresses the importance of the approach taken in the Commission's proposal**, according to which **economic operators will ultimately define the most appropriate measure according to the nature and size of the installation.**

Certifications

Existing national schemes should be taken into account and recognized in future. Instead of imposing new certifications, integrating the new requirements in the existing certifications would reduce administrative burden and related costs while offering just as many benefits.

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