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Microplastics pollution – measures to reduce its impact on the environment; call for evidence

I. Concerning the policy options for plastic pellet loss

To reduce the unintentional release of microplastics by the plastics industry into the environment, the existing voluntary approaches pioneered by industry should be continued and extended. For example, independent 3rd party certification schemes could be introduced.

Through numerous initiatives, such as Zero Pellet Loss or Operation Clean Sweep (OCS), the plastics industry ensures that plastic raw materials, such as pellets or flakes, or processing residues, such as scrapings, are treated properly. These established and successful systems can easily be extended and/or adopted as needed.

In 2015, PlasticsEurope, the European association of plastics producer, joined the global initiative “Operation Clean Sweep®” (OCS), which aims at achieving zero pellet loss. As the main host of the program in Europe, PlasticsEurope is coordinating its implementation. It is encouraging the entire plastics value chain - its member companies, logistics providers, transporters, converters or recyclers - to join the program. By signing the European OCS each pellet handling company recognises the importance of preventing pellet spillage and their loss into the environment and commits to the following six actions:

1. Improve the set-up of the work-side to prevent and address spills.
2. Create and publish internal procedures to achieve zero industrial plastic material loss.
3. Provide employee training and accountability for spill prevention, containment, cleaning and disposal.
4. Audis on a regular basis.

5. Comply with all applicable state and local regulations governing industrial plastics containment.
6. Encourage partners (contractors, transporters, distributors, etc.) to pursue the same goals.

Meanwhile, 100 % of PlasticsEurope member companies have become OCS signatories. Currently, Plastics Europe is developing OCS requirements for a certification scheme, which will be fully operational by 2022, with the aim of all PlasticsEurope member companies having been externally audited by 2025.

II. Measures of the Austrian plastics industry to reduce the amount of plastic pellet losses to the environment

The Austrian plastics industry supports the following proposed measure to reduce plastic pellet losses:

- **Further developing existing voluntary approaches pioneered by industry via Operation Clean Sweep**

A vast number of companies from the Austrian plastics industry joined "Operation Clean Sweep" (OCS). Additionally, already in March 2015, 21 companies signed up voluntarily to the "Zero Pellet Loss" pact between the Austrian Ministry of Agriculture, Forestry, Environment and Water Management (BMLFUW) and the Association of the Austrian Chemical Industry (FCIO). Shortly afterwards even more companies joined the pact resulting in a coverage of approximately 90 % of industrially handled plastics in Austria.

Companies that join the pact, commit to implement internal measures that avoid plastic losses in water as far as possible. A survey conducted by the FCIO, identified the 10 most effective practical measures, that constitute the core of the "Zero Pellet Loss Pact":

1. Installation of catch trays at every loading point.
2. Strategic placement of pellet collection containers for disposal.
3. Regular inspections of sieves to avoid wastewater pollution.
4. Proper closing of all outlet caps before shipping.
5. Thoroughly unloading of bulk containers.
6. Removal of spilled pellets from the top of the truck before leaving the containment area.
7. Installation of central ventilation / suction systems, where applicable.
8. Proper disposal of collected pellets.
9. Training of employees.
10. Information of logistics partners.

According to a study conducted by the Austrian Environment Agency (Umweltbundesamt) and the University of Natural Resources and Life Sciences Vienna (BOKU) in 2014-2015, 10 %

of the Danube´s plastic load can be attributed to industrial pellet losses. First evaluations showed that approximately 80 % of plastic pellet losses were prevented after implementing the "Zero Pellet Loss Pact" measures. Pellets that reach the Danube from the Austrian plastics industry are therefore estimated to be reduced to about 1 kilogram a day.

- **Introducing mandatory staff training and labelling of pellet containers and tanks as harmful for the Environment**

Training of employees is already one of the core measures withing the "Zero Pellet Loss Pact" and OCS. This includes the application of warning signs at strategically important sites.

The Austrian "Zero Pellet Loss Pact" has demonstrated to be exceptionally efficient without the need of regulatory frameworks. Furthermore, in January 2021, PlasticsEurope and European Plastics Converters (EuPC) signed a collaboration agreement to develop a certification system to control the pellet loss across the whole plastic supply chain by 2022.

All signatory companies of the scheme will be audited regularly by accredited third parties to establish their compliance with OCS requirements. It will also support the effective, harmonized, and quantifiable implementation of the OCS program, with the aim to gradually phase out all losses of plastic pellets into the environment.

We therefore do not see the need for any further regulatory measures for plastic pellets.

III. Microplastic release from textile sources

- **General**

Microplastic emissions from textile sources are discussed very emotionally for years and arguments are often made with a lack of a scientific basis. In this regard, it is of particular importance that the analysis of this sector is analyzed carefully, scientifically and based on solid facts.

Studies[1] have already shown that textiles are not the main source of microplastics emissions entering the environment. However, textiles are nevertheless disproportionally criticized and focused on. For example, only the Call For Evidence document contains twice as many measurements for synthetic textiles than for the other areas.

In relation to the measured data, we want to highlight that exact statements about the microplastic loss from textiles, e.g. during washing, can only be made, if there are adequate standardized test methods.

- **Proportionality**

It is essential that EU legislation or other legal measures related to the release of microplastics from textile sources are proportional. This proportionality is of great importance because the proposed measures will have far-reaching effects on the properties, functions, handling, recycling and also on the service-life of textile products. In addition, the measures will be associated with additional effort and costs both for the manufacturers (the Austrian Textile and Clothing Industry) and for consumers / society.

As long as no exact effects on the environment from the loss of microplastics from textiles can be proven due to a lack of measurement methods, a lack of toxicity-data or lack of emission-/pollution-data after water treatment, the precautionary principle can be applied. However, this must happen with the necessary assessments and the corresponding proportionality.

- **Toxicity**

At the current time, no scientific evidence is known about the toxicity of microplastics from textile sources. This fact must also be considered when determining the proportionality.

- **Harmonised standard methods to measure unintentionally released microplastics**

Today there is no adequate official methodology, neither to measure the microplastic release from textiles nor to distinguish between different fibers. Therefore a standardized, reliable, and affordable methodology to measure precisely the microplastic release with an exact differentiation between plastic and non-plastic fiber, fiber fragments and particles

[1] Studie Fraunhofer Institut; Kunststoffe in der Umwelt: Mikro- und Makroplastik https://www.umsicht.fraunhofer.de/content/dam/umsicht/de/dokumente/publikationen/2018/kunststoffe-id-umwelt-konsortialstudie-mikroplastik.pdf

needs to be developed. Since the measures related to microplastics will have essential effects on the textile and clothing industry as well as for the entire European society, it is essential that such standards are developed with the necessary care.

The currently available draft of EN ISO 4484-1 – "Textiles and textile products — Microplastics from textile sources Part 1", needs to be revised. The method described in Part 1 is too error prone. Round-robin tests and ring trails must be carried out to guarantee the quality and functionality of standards. Furthermore, Part 1 of the EN-standard requires Part 2, without it measurement results could be misinterpreted significantly.

- **Different Measures for considerations:**

Use of new biodegradable yarns
A replacement of synthetic fibers should only happen in those textiles where it makes sense. In particular the function or durability of a textile must be taken into account.

Pre-washing of clothing
This measure bears the high risk of only being a shift in emissions, often to another region of the world.

Take-back systems
Take-back systems should only be installed on a voluntary basis and only where it makes technically sense. In the future, collection and recycling systems for textiles will be established for such discarded textiles, which are an important secondary raw material. General obligatory take-back schemes could be even a handicap for such systems, because mixed textile-fractions and/or blended fabric first would be collected in the general take-back system and then would have to be separated in the recycling system, if such a separation is possible at all.

Facilitating recycled content or re-manufacturing
Funding systems for the research and development of textile recycling and the establishment of recycling hubs for textiles must be boosted. The SMEs in the European textile and clothing industry must be supported by individual funding programs in the transformation process from a linear to a circular economy. Among other aspects, this must in particular include digitization and the improvement of manufacturing processes.

Labelling products according to their level of microplastic emission
If a labeling obligation connected to the washing of a textile product is introduced, then this needs to be harmonized at EU-level.

IV. Microplastics in other industries

- **Biodegradability**

Any microplastics regulation needs to have an exemption for biodegradable. The criteria need to exclude natural polymers (e.g. lignin or cellulose after extraction, precipitation and subsequent drying). Minor chemical changes caused by extraction processes must be tolerated. All substances – for example independent from the sources - that meet the same criteria should be considered biodegradable.

- **Sensible use of plastic**

Wherever the use of plastic makes sense for functional reasons (e.g. coatings on food packaging, medical products, thermal insulation, ...), improper disposal must be avoided instead of restricting the use of materials that are essential for product quality. Potential environmental disadvantages in terms of microplastic must always be compared with advantages, enabled by the use of plastics, for human health and the environment, while risk reduction should have a top priority.

We kindly ask to consider our comments. For further questions, do not hesitate to contact:

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