Position Paper



Definition of plastics pellets in the PPLR in relation to powder coatings

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The definition of plastic pellets in the new EU Plastic Pellet Losses Regulation (EU) 2025/2365 (PPLR) is ambiguous and leaves room for interpretation. It could potentially be interpreted very broadly and beyond the Regulator's original intent. The potential of such broad interpretation raised concerns among CEPE's members that powder coatings may be considered in scope of this regulation. In this position statement, CEPE wants to state and clarify why powder coatings should not be regarded as plastic pellets under the definition set out in the PPLR.

CEPE's main rational for not classifying powder coatings as plastic pellets under the PPLR is that powder coatings are not 'produced for moulding in plastic product manufacturing operations'. Powder coatings result in a coating on various substrates - including metal, wood, concrete, and plastic – but the resulting coating itself does not constitute a plastic product. In contrast to extruded films that form the primary structure of a plastic product, a coating is a non-integral component applied to provide colour and/or protect the underlying product from deteriorating effects of sun, rain, and other environmental influences. Powder coatings are used for coating objects, not for shaping into films. Therefore, CEPE consider them outside the scope of the PPLR.

While the definition was changed several times during the regulation's drafting process, powder coatings were never indicated as within scope at any point. Even more, coatings were identified by the Commission as a distinct source of microplastics pollution which will be addressed separately through the Ecodesign of Sustainability Products Regulation (ESPR).

Proper management practices to prevent spills of any chemical material to the environment is a standard practice and part of existing regulations. We do not consider including powder coatings and their raw materials in the PPLR to be proportionate to the intended objective.