



Downstream Users of Chemicals Co-ordination group



The International Fragrance Association



## Call to Action:

# Revoke the Microplastics Reporting Obligation

31 March 2025

We call on Commissioner Roswall to revoke the reporting requirements in entry 78 of Annex XVII to Regulation (EC) No 1907/2006.

### Why?

- > The reporting obligation causes significant administrative burdens, especially for SMEs
- > The reporting obligation is unnecessary and will provide limited insights

Commission Regulation (EU) 2023/2055 also known as the REACH-restriction on microplastics, amends Annex XVII of the REACH Regulation and imposes a reporting requirement for derogated uses, such as for paint and printing inks, adhesives and sealants, construction chemicals, fragrances and others. Companies are required to report their emissions at the product site, as well as emissions from their consumer and professional users. The reporting will be conducted annually with companies first having to submit their reports in 2027 over the previous calendar year.

In line with the mission statement of President Von der Leyen, stating that Commissioners must contribute to reducing reporting obligations by at least 25% - and for SMEs at least 35%, we urge Commissioner Roswall to revoke the microplastics reporting obligations as described in paragraph 11 and 12 of entry 78 of Annex XVII to Regulation (EC) No 1907/2006.

This should be done for the following reasons:

### 1. The requirement causes significant administrative burden, especially for the thousands of SMEs

The companies that will have to report include the aforementioned producers of mixtures, and also their industrial downstream users, such as the automotive industry or carpentry factories. A large majority of the companies having to report are SMEs, who will be particularly affected as they often lack the resources to comply with extensive reporting obligations.

Our companies use a wide range of products and raw materials and work with many suppliers. The reporting requirements obliges them to record and manage extensive amounts of data such as end

uses, generic information on the polymer types, concentrations and corresponding emissions. The administrative burden on companies is large.

The designated reporting tool, IUCLID, is notoriously user-unfriendly. IUCLID is used by REACH-registrants, mostly larger companies, with specialised expertise. The system is known to be difficult to understand and navigate, let alone for SMEs who have had no experience with this before and have to dedicate and educate staff for this purpose. Furthermore, ECHA's reporting tools are notoriously only available in English. This is a major disadvantage for SMEs with a very limited number of highly trained employees, who sufficiently understand regulatory English.

## 2. The data is of limited use

Companies will be required to estimate emissions at their production sites, including those generated during transport, as well as emissions from both professional and consumer use. However, rather than developing their own calculation methods to come to these estimations, most companies—particularly SMEs—will rely on expert judgments at the EU level. This is because accurate estimations require a wide variety of considerations, such as multiple emissions routes and corresponding emission factors, which SMEs often lack the capacity or expertise to conduct independently.

As a result, many companies will use the same emission factors, making the collected data redundant, as the European Commission could achieve the same or even a more accurate outcome more efficiently by conducting sector-specific studies, as has already been done—for example, the RIVM report from October 2024.<sup>1</sup>

Furthermore, for the companies that do choose to develop their own estimations, this would likely lead to huge inconsistencies and inaccuracies in the data, ultimately undermining the reliability of the data for regulatory purposes.

### Conclusion:

Requiring to report at company level will provide little additional benefit compared to higher level studies, which have already been performed. However, it will place a significant complex administrative burden on companies, especially SME.

Removing the reporting requirements from the microplastics restriction aligns with the EU's commitment to regulatory simplification and burden reduction, especially for SME since SMEs are disproportionately impacted by this reporting requirement.

The signatories of this letter strongly urge the European Commission to revise entry 78 of Annex XVII to Regulation (EC) No 1907/2006 by removing the reporting obligations for derogated uses, to foster a more competitive regulatory environment.

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<sup>1</sup> [Main sources of microplastics in the environment are tyre erosion, plastic waste and industrial plastic granules | RIVM](#)

## List of signatories



CEPE, The European Council of the Paint, Printing Ink, and Artist's Colours Industry



DUCC, The Downstream Users of Chemicals Co-ordination Group



FEICA, Association of the European Adhesive & Sealant Industry



SME United, The Association of Crafts and SMEs in Europe



A.I.S.E., The International Association for Soaps, Detergents and Maintenance Products



EFCC, The European Federation for Construction Chemicals



FECC, European Association of Chemical Distributors



The International  
Fragrance Association

IFRA, The International Fragrance Association



I&P Europe, Imaging and Printing Association