

CEPE Note for EU Powder Coatings Customers Powder Coatings & the REACH Restriction on Microplastics

On September 27, 2023, the European Commission issued a new regulation on microplastics¹ aimed at restricting their use and reducing emissions of microplastics into the environment. This REACH restriction defined microplastics as synthetic polymer microparticles, polymers that are solid and fulfill both of the following conditions:

- > Are contained in particles and constitute at least 1% of those particles; or build a continuous surface coating on particles
- > At least 1% of the particles in the point above meet either of the following requirements:
 - ≤ 5 mm for all particle dimensions
 - ≤ 15 mm for particle length with a length to diameter ratio of more than three

In accordance with this definition all powder coatings are 100% microplastics.

The ban on use does not apply to the placing on the market of powder coatings according to derogation stated on paragraph 4 (a) to the restriction which covers the microplastics for use at industrial sites. However, the introduction of this restriction has brought new legal obligations for powder coatings suppliers, manufacturers and users located in the EU.

As of October 17th, 2025, Powder Coatings Manufacturers:

- > Need to provide instructions on **use and disposal** (<u>Safe Handling Powder Coatings Guidance</u> V.9)
- Need to include i.e. in the Safety Data Sheets the following statement:
 "The synthetic polymer microparticles supplied is subject to the conditions laid down by entry 78 of Annex XVII to Regulation (EC) No 1907/2006 of the European Parliament and of the Council"
- Need to inform the customer on the quantity of SPM in the product i.e. 100%.
- > Need to give information of the **generic identity** of the polymeric basis to the microplastics contained in the product.

From 2027, before May 31st of the year, Final End-Users / our Powder Coating Customers will need to provide annually to ECHA the following information:

- > A description of their uses in the calendar year before.
- > For each use, generic identity of the polymers used.
- > For each use, an estimation of the amount of SPM released to the environment during the past year and an estimation of the quantity released during transport.
- > For each use, a reference to the derogation laid down in paragraph 4a of the Restriction
- > Details of these obligations may be found on the ECHA website (link) and in their guidance (scheduled to be published within the next few months).

The CEPE Powder Coatings Sector Group, Brussels May 2025.

¹ REACH restriction of synthetic polymer microparticles. Entry 78 of Annex XVII REACH, as amended by Commission Regulation (EU) 2023/2055