POSITION PAPER





"REACH RESTRICTION ON MICROPLASTICS"

Continuous Filament Glass Fibre manufacturers support ECHA initiative to address the issue of microplastics in the environment

LEGAL DISCLAIMER

This document is provided for information purposes only and represents our industry position paper on the newly published "Commission Regulation (EU) 2023/2055 of 25 September 2023 amending Annex XVII to Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) as regards synthetic polymer microparticles" (hereinafter, the "**REACH Restriction on Microplastics**"). The information provided within this position paper does not, and is not intended to, constitute any legal advice or a substitute for detailed advice on specific products and should not be taken as providing legal advice on any of the topics discussed. Glass Fibre Europe does not warrant the accuracy or completeness of the information in this publication and assumes no responsibility for actions taken by national authorities in relation to specific products.

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EXECUTIVE SUMMARY

This is the review of Glass Fibre Europe's members of the REACH Restriction on Microplastics, sharing our industry's understanding and observations concerning relevant aspects related to Continuous Filament Glass Fibre products.

Scope of the restriction:

Synthetic polymer microparticles, defined as:

Based on this review and to the best of our understanding, the restriction applicable to synthetic polymer microparticles does not have an impact on the continued manufacturing and supply of Continuous Filament Glass Fibre products.

polymers that are solid and which fulfil both of the following conditions:

(a) are contained in particles and constitute at least 1 % by weight of those particles; or build a continuous surface coating on particles;

(b) at least 1 % by weight of the particles referred to in point (a) fulfil either of the following conditions:

(i) all dimensions of the particles are equal to or less than 5 mm;

(ii) the length of the particles is equal to or less than 15 mm and their length to diameter ratio is greater than 3.

Restriction:

§1. <u>Shall not be placed on the market as substances on their own or</u>, where the synthetic polymer microparticles are present to confer a sought-after characteristic, <u>in mixtures</u> in a concentration equal to or greater than 0,01 % by weight.

§4. Paragraph 1 shall not apply to the placing on the market of:

(a) synthetic polymer microparticles, as substances on their own or in mixtures, for <u>use at</u> <u>industrial sites.</u>

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Observations:

- Continuous Filament Glass Fibre products are "Articles" according to the definition in REACH Article 3 (3). See also Glass Fibre Europe's position paper https://glassfibreeurope.eu/position-reach-regulation-status-of-continuous-glass-fibre-products
- The proposed restriction is applicable to <u>substances and mixtures</u>. It is not applicable to **Articles** and therefore **not applicable to Continuous Filament Glass Fiber products** (e.g. Rovings, Yarns, Chopped Strands, Mats, etc.)
- Some chemical raw material used in the formulation of sizing or binder of Continuous Filament Glass Fibre products may be synthetic polymer microparticles according to the Regulation definition. The determination and communication are the responsibility of the suppliers of chemical raw materials.
- Such uses as mentioned hereabove are uses that fall under the scope of the REACH Restriction on Microplastics exemption established for uses at <u>industrial sites</u>, therefore such <u>uses</u> are not subject to the newly adopted restriction on the placing on the market of microplastic according to §4 of the Regulation.
- Such uses will be made in accordance with the instructions communicated by the suppliers.

Our conclusions:

The newly adopted REACH Restriction on Microplastics is not expected to have an impact on the continued manufacturing and supply of Continuous Filament Glass Fibre products according to Glass Fibre Europe members' analysis.

About Glass Fibre Europe – EU Transparency Register n°635608817518-09. Glass Fibre Europe, founded in 1987, is the voice of the European continuous filament glass fibre industry. It is composed of 8 companies: 3B the fibreglass company, Envalior, FYSOL SAS, Johns Manville, Nippon Electric Glass, Owens Corning, Valmiera Glass, and Saint-Gobain Vetrotex. Glass Fibre Europe represents all the major producers of continuous filament glass fibre in Europe. The continuous filament glass fibre industry is the cornerstone of the glass-based composite materials and technical textiles value-chains. Glass fibre's unique properties enable the production of wind energy, electric and electronic devices, and the development of sustainable solutions in a wide range of applications, such as transport and construction.