



## Strengthening EU Rules on Pellet Loss: A necessary move to prevent the damage and reduce the cost of microplastic pollution

Plastic pellets, flakes and powders constitute the primary building blocks for the majority of today's plastic products, yet these are hazardous microplastics that are frequently lost across the plastic supply chain – cradle to cradle – from polymerisation to manufacturing to cleaning to recycling operations. This leads to persistent and preventable pollution across the EU, a situation that demands immediate attention and action.

To effectively reduce the environmental and economic burden of pellet loss, a comprehensive supply chain approach is essential to implement, with robust and binding measures for all operators at every stage of the supply chain, ensuring that those responsible for pollution are held accountable rather than leaving EU public authorities and citizens to pay. Such binding prevention steps will protect public health and ecosystems while cutting long-term costs for European communities by curbing the ongoing effects of microplastic pollution.

Although the current Proposal includes steps to address pellet loss, the Parliament found it necessary to take a more robust and comprehensive approach to reduce pollution significantly. Thus, we recommend the following improvements to the proposed Regulation:

**1. Apply measures, certification and audits to all operators.** Article 1(2) of the Proposal exempts operators handling quantities lower than 5 tonnes per year and imposes reduced requirements for those handling less than 1,000 tonnes. For context, one kilogram of plastic pellets contains 50,000 granules. One tonne contains 50 million granules. **One thousand tonnes contains a staggering 50 billion granules** – even minor spills from small-scale operators can result in significant environmental damage. Eliminating exemptions for SMEs and ensuring independent compliance checks and audits for all operators are essential to avoid regulatory loopholes that undermine the EU's environmental goals. Requiring the certification of all operators will provide a level playing field, enhance accountability, and ensure all contributors to pellet loss are adequately regulated.

**2. Strong definitions that do not generate loopholes.** Adequate definitions will ensure legislation without loopholes, promote consistent enforcement and reduce the economic and environmental burden on EU communities, ultimately protecting ecosystems and saving public funds by holding operators accountable for preventing and remediating spills.

- **Article 2(a)** defines plastic pellets without explicit reference to flakes and powders and with reference to uniform dimensions. However, all forms of plastic feedstock (pellets, flakes or powders) present the same risk to human health and the environment and should thus be in the scope;
- **By including all EU and non-EU carriers, including maritime transport**, the Regulation will ensure that ships and carriers in its territory follow proper prevention and pellet loss response protocols.

### 3. Mandate binding and effective prevention requirements for all pellet handlers.

The number of pellets entering the environment (184,000 tonnes a year in the EU) demonstrates that, to date, pellet handlers have failed to put the necessary equipment, packaging, containment and clean up response procedures in place to mitigate pellet loss. The Regulation should, therefore, **strengthen Annex I prevention requirements and ensure legally binding minimum requirements apply to all operators**, in line with European Parliament's first reading report and with OSPAR's recommendation of 2021:

- Use of robust and sealed packaging to store and transport pellets, use of retention tanks to retain lost pellets during handling, transfer and storage, and use of best practices to handle, clean up and maintain pellet containers.
- Sound containment of all handling facilities with external barriers, retention grounds and proper catchment devices that are regularly inspected, cleaned and maintained.
- Immediate and systematic cleanup of losses to prevent irreversible microplastic pollution, using approved adequate equipment.

### 4. Secure information and training on the hazardous nature and impacts of pellets.

It is imperative that all workers handling pellets receive regular and adequate information and training to be aware of and prevent potential risks. The Regulation should, therefore, **require all handlers to host regular staff training sessions** (limited to bigger operators in the original proposal) and **display information labels on pellet containers about cargo and associated risks** (see Parliament first reading proposal, Art.3 (3bis)).

### 5. Mandate systematic reporting of all losses, acute or chronic.

Reporting all losses of plastic pellets to the environment is a fundamental component of a holistic approach to mitigating plastic pellet pollution. For transparency throughout the supply chain, pellet handlers should **report the quantity of pellets they manage to establish a baseline** for measuring the Regulation's effectiveness. **Harmonised reporting** of pellet losses is also essential to ensure accountability and support informed decision-making.

Thus, we recommend:

- All operators, including SMEs, are mandated to report losses through a standardised form.
- All pellet handlers should promptly report incidents or accidents to the competent authority to ensure immediate intervention.
- Including the quantity of pellets handled and overall estimated losses in annual reporting requirements.

### Summary:

To enable a robust framework, the Regulation must eliminate exemptions for SMEs, target all forms of plastic feedstock and include binding and effective prevention requirements. Regular training and information for all pellet handlers will secure awareness of the plastic value chain, and harmonised reporting obligations and independent audits will ensure enforcement and accountability. These steps will reduce future expenses tied to pollution cleanup and legal liabilities. Moreover, by following these recommendations, the EU will enhance the effectiveness of the Regulation and work towards achieving the 30% reduction in microplastic pollution outlined in the Zero Pollution Action Plan by 2030, while ensuring a balanced and cost-effective approach for all industry players.