

# CropLife Europe Microplastics Position Paper

## Priorities

1. CropLife Europe (CLE) advocates for a **transition period of 11 years** for crop protection products, seed treatments and coatings. This is to allow sufficient time for the supply chain to formulate new material and have them approved under the EU regulatory system.
2. We support a **size limit that does not go below 0.1 µm** (= 100 nm) as proposed by the European Chemicals Agency (ECHA) to ensure compliance and enforceability.
3. We **support the biodegradability criteria** as proposed by ECHA.

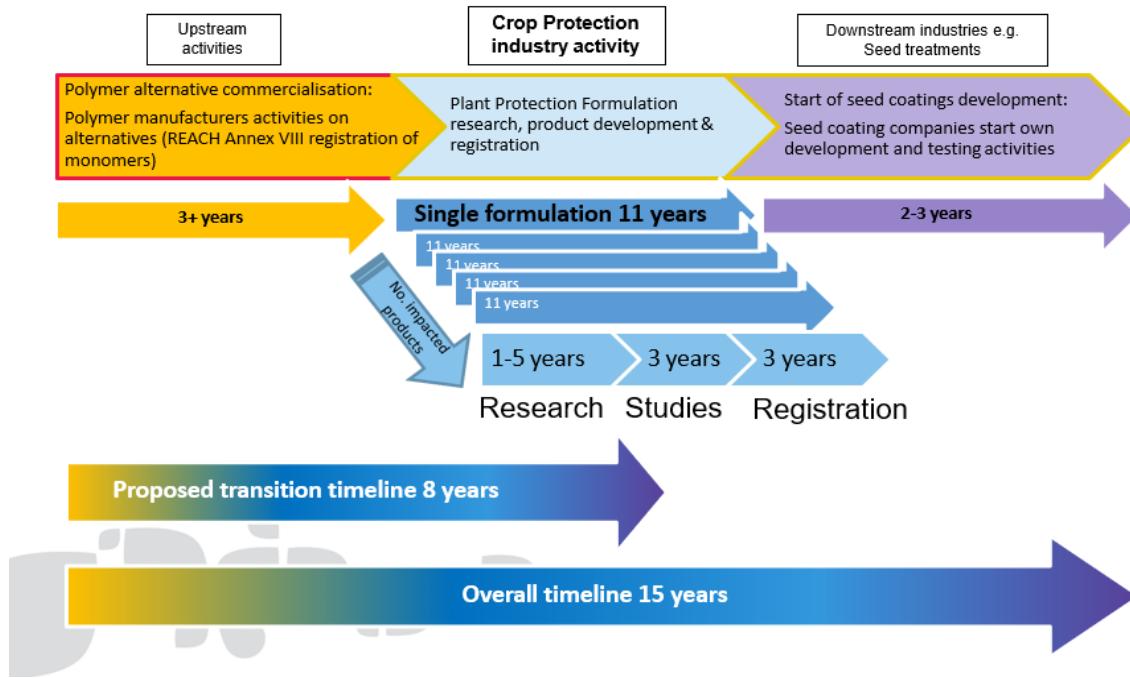
CropLife Europe (CLE) understands the societal concerns with microplastics and supports the objective to reduce the use of intentionally added microplastics. CLE member companies are actively looking at alternatives to replace long-lasting materials as rapidly as possible. CLE members are also reliant on third party suppliers to bring alternatives to market and register them under REACH before they may be used. The encapsulation of active ingredients and seed treatments helps farmers to reduce pesticide use and risks which is in line with the objectives of the Farm to Fork and Biodiversity strategies. It also reduces the potential for operator exposure to pesticides and helps prevent undesirable environmental impacts – all of which improves safety. ECHA itself has acknowledged the importance of polymer encapsulation technologies in the restriction proposal. The restriction proposal estimates that the quantities contributed by the crop protection industry is a tiny fraction of the total amount of microplastics generated<sup>1</sup>.

In this context, we encourage the European Commission, and the Member States, to consider our three main priorities during their risk management discussions:

### 1. Appropriate transition timelines – 11 years

- We need transition periods to allow us to develop safe and sustainable alternatives that are compliant with the stringent EU pesticide registration requirements.
- If the period is too short it could lead to more pesticide use and extra spraying applications (with the associated impact on Green Deal delivery and carbon emissions from tractors). We believe it is important to avoid such unintended consequences.
- As detailed in the graphic below the overall timeline for crop protection products from research to market was estimated to be 15 years. This means that the proposed 8 year transition period would be insufficient to enable satisfactory replacements. **In our view 11 years would be an effective timeline to ensure a smooth transition.**
- The transition time for seed treatments (containing a plant protection product) and for the polymers for seed coatings should be aligned to avoid double reformulation in the seed industry.
- In connection with this **we fully support ECHA's proposal for a progress review 4 years after the entry into force of the restriction proposal** to see how the search for effective replacements is evolving. Our hope is to see breakthrough materials, rapid reformulation and prompt regulatory assessment and approval.

<sup>1</sup> Calculation based on figures from Table 1 of ECHA ANNEX XV RESTRICTION REPORT PROPOSAL FOR A RESTRICTION <https://echa.europa.eu/documents/10162/05bd96e3-b969-0a7c-c6d0-441182893720>



## 2. Enforceable size limit – not below 0.1 µm (= 100 nm) - ECHA proposal

- **We support ECHA's proposal**, as we understand it, to set the lower size limit at 0.1 µm at least temporarily. We would have serious concerns about the enforceability of, and compliance with, any lower size limit.
- We believe that reliable measurement in the range below 0.1 µm is technically challenging to achieve. Both authorities and industry would not have the necessary capabilities to ensure a level playing field, which could lead to significant enforceability issues.

## 3. Workable biodegradability exemptions – ECHA criteria

- Our industry is working to replace microplastic polymers with suitable biodegradable materials where possible.
- We believe that biodegradability criteria are a critical component in the overall proportionality of the restriction proposal. The criteria should reflect the degradation time needed for similar sized pieces of natural materials e.g. leaves, wood, and only in the relevant environment they are used e.g. soil.