

Joint Industry REACH Restriction Labelling Technical Paper

Background

Commission Regulation (EU) 2023/2055¹, amended Annex XVII of the REACH regulation by introducing “entry 78”, to restrict the use of synthetic polymer microparticles on their own or intentionally added to mixtures (the “microplastics restriction”) and came into effect on the 17th of October 2023.

This means that producers are required to include information regarding the nature of products containing Synthetic Polymer Microparticles (SPMs), the quantity of SPMs within the product, the generic polymer identifier, and Instructions For Use and Disposal (IFUD) in text form or, where applicable, with pictograms. This information must be displayed on the label, packaging, or package leaflet of products that contain SPMs, or on the safety data sheet. Additionally, suppliers have the option of providing a digital tool that allows access to an electronic version of this information. These requirements will come into effect on the 17th of October 2025.

In addition, and on the 8th of April 2025, the Council and the European Parliament provisionally agreed on a Regulation on preventing the loss of plastic pellets². Although the final text is yet to be published, it is expected that this forthcoming regulation will set, amongst other regulatory measures, (non-CLP) labelling requirements for plastic pellets. These requirements are related to the labelling obligations established under the REACH Restriction on SPMs and are referred to in this paper where relevant.

Reference text:

“7. From 17 October 2025 suppliers of synthetic polymer microparticles referred to in paragraph 4, point (a) [SPM for use at industrial sites], shall provide the following information:

- (a) instructions for use and disposal explaining to industrial downstream users how to prevent releases of synthetic polymer microparticles to the environment;*
- (b) the following statement: “The synthetic polymer microparticles supplied is subject to conditions laid down by entry 78 of Annex XVII to Regulation (EC) No 1907/2006 of the European Parliament and of the Council”;*
- (c) the information on quantity or, as applicable, concentration of synthetic polymer microparticles in the substance or mixture;*

¹ 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, Authorisation and Restriction of Chemicals (REACH) as regards synthetic polymer microparticles.

² See Council of the EU [press release](#) of 8 April 2025.

- (d) *generic information on the identity of the polymers contained in the substance or mixture that enables manufacturers, industrial downstream users and other suppliers to comply with their obligations laid down in paragraphs 11 and 12.*

10. The information referred to in paragraph 7 shall be provided in the form of clearly visible, legible and indelible text or, where appropriate, in the form of pictograms. The text or pictograms shall be placed on the label, the packaging, or the package leaflet of the products containing synthetic polymer microparticles or, regarding the information in paragraph 7, on the safety data sheet. In addition to the text or pictograms, suppliers may provide a digital tool that gives access to an electronic version of that information. Where instructions for use and disposal are provided in accordance with paragraph 7 in the form of a text, they shall be in the official languages of the Member States where the substance or mixture is placed on the market, unless the Member States concerned provide otherwise.”

Aim

This technical paper proposes a **harmonised approach to the nature and placement of information required for compliance with REACH Restriction and the upcoming Pellet Loss Prevention Regulation**; developed for use by the entire plastics value chain as a joint initiative between the Association for European Manufacturers of Expanded Polystyrene (EUMEPS), the European Converters Association (EuPC) and its European Masterbatchers and Compounders (EuMBC) Product Group, and Plastics Europe.

IFUD

The IFUD concept is not novel; rather, it can be built upon several well-established regulatory and standardisation frameworks. The following references are particularly relevant:

- IEC/IEEE 82079-1:2019: This international standard provides comprehensive principles and requirements for creating instructions for use of products, including their safe and efficient handling throughout the product lifecycle.
- REACH Article 33: Requires suppliers of articles containing Substances of Very High Concern (SVHCs) above 0.1% w/w to provide sufficient information to allow safe use, including disposal where relevant.
- REACH Annex II, Section 13: Offers guidance on compiling Safety Data Sheets (SDS), specifically covering waste treatment methods and disposal considerations.

From these, applicable statements can be derived for both use and disposal and could be combined in the following:

- *For industrial use only*
- *Not intended for consumer sale or use*
- *Do not discharge directly into drains, air, soil, or the aquatic environment*
- *Disposal practices must comply with all relevant national, provincial, municipal, and local regulations.*

Furthermore, the proposed IFUD could incorporate use indications aligned with the working definition of a pellet under the upcoming Pellet Loss legislation. These indications would specify that the product is *used in plastic manufacturing processes, encapsulated in a matrix, or contained in the product itself*. As such, the statements above could be integrated with:

- *For industrial use only. Not intended for consumer sale or use.*
- *Intended to be used in plastics manufacturing processes, or encapsulated in a matrix, or contained in the product itself.*

Pictograms

The IFUD must be translated into the official language(s) of the Member State(s) where the product is placed on the market. Alternatively, some statements could be represented by pictograms, similar to the Safe Use Icons developed by A.I.S.E. for detergents and household products. While pictograms eliminate the need for translation, their development may require significant time, and delay compliance with the October 2025 requirement.

However, the Pellet Loss Regulation is mandating the use of a warning pictogram (a triangle containing an exclamation mark). Therefore, if pictograms are considered viable for the IFUD, it may be useful to consolidate all pictograms—whether for REACH or the Pellet Loss Regulation—within a single location: the label, or packaging, or packaging leaflet, or the SDS.

Mandatory Statements

The statement “The synthetic polymer microparticles supplied is subject to conditions laid down by entry 78 of Annex XVII to Regulation (EC) No 1907/2006 of the European Parliament and of the Council” must be included on either:

- The label
- The packaging
- The packaging leaflet
- The SDS.

This guidance document provides recommendations on placement and proposes a standardised text including:

- The IFUD,
- The quantity of synthetic polymer microparticles (SPMs),
- The Generic Polymer Identifier, and
- The standard warning statement required under the Pellet Loss Regulation;


As the Pellet Loss Regulation also mandates the inclusion of a standard warning statement, it may be useful to place both the REACH and Pellet Loss Regulation-mandated statements together in the same location—either on the label, or the packaging, or packaging leaflet, or the SDS.

Generic Polymer Identifier

For the Generic Polymer Identifier, alignment is proposed with Plastics Europe’s position on REACH Restriction implementation, which instructs companies to use the list of identifiers derived from HS codes developed by Cefic, to ensure an aligned industry approach.

Proposal

Out of the four possible locations where the information needed to comply with the labelling requirements, the SDS seems to be the preferred one as it is the easiest to implement in the short timeframe available rather than the packaging and labels. Considering this, and the difficulty of developing appropriate pictograms before the start of the implementation of the labelling requirement (17th October 2025), the following proposal is made for addition to the SDS of pellets and other pre-production primary microplastics:

<i>Text</i>	<i>Justification</i>
<i>The synthetic polymer microparticles supplied is subject to conditions laid down by entry 78 of Annex XVII to Regulation (EC) No 1907/2006 of the European Parliament and of the Council</i>	Mandatory statement (REACH Restriction on SPMs)
<i>Harmful to the environment – avoid losses</i>	Mandatory statement (Pellet Loss Prevention Regulation)
	Mandatory pictogram (Pellet Loss Prevention Regulation)
<i>For industrial use only. Not intended for consumer sale or use.</i>	IFUD (specifically, use)
<i>Intended to be used in plastics manufacturing processes, or encapsulated in a matrix, or contained in the [final] product itself.</i>	IFUD (specifically, use)
<i>Do not discharge directly into drains, air, soil, or the aquatic environment.</i>	IFUD (specifically, disposal)
<i>Disposal practices must comply with all relevant national, provincial, municipal, and local regulations.</i>	IFUD (specifically, disposal)

<p><i>nnnn [generic polymer name(s)]</i></p> <p>Example: 3901 polymers of ethylene, in primary forms</p>	<p>Generic polymer identity(es) of the SPMs contained in the product.</p> <p>Corresponding to the list of identifiers derived from HS codes developed by Cefic for the reporting mandated by the REACH Restriction on SPMs.</p>
<p><i>This product contains nn% of polymer X</i></p> <p>Or</p> <p><i>This product contains xx g of polymer X per [bag/bin etc] of nn kg</i></p>	<p>Quantity or the concentration of SPM in the product</p>