2024 Edition

Factsheet 8: EU Microplastics Regulation

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EU Strategy for Sustainable and Circular Textiles
EU Corporate Sustainability Due Diligence Directive
EU Corporate Sustainability Reporting Directive
New York Fashion Act
EU Forced Labour Regulation & Guidance
US Uyghur Forced Labor Prevention Act
EU Ecodesign for Sustainable Products Regulation
EU Packaging & Packaging Waste Directive & Provisional Regulation
EU Microplastics Regulation
UK Plastic Packaging Tax
EU Product Environmental Footprint Guide
EU Textiles Regulation
EU Taxonomy
The German Due Diligence in the Supply Chain Act

Lessons for Fashion: How the agricultural sector is tackling commercial compliance through the EU Directive on unfair trading practices

Upplier's Guide 2.0 Key Sustainability Legislation in the EU, US, and UK

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Acknowledgements

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The Remedy Project is a social enterprise that works to improve access to justice and remedy for migrant workers in global supply chains. They work constructively with governments, civil society, law enforcement, and the private sector to translate the UN Guiding Principles on Business and Human Rights into practice. For more information please see www. remedyproject.co.

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This resource was commissioned and led by:

Crystal International Group Limited Diamond Fabrics Limited (Sapphire Group) Lenzing Aktiengesellschaft Pactics Group Poeticgem Group Shahi Exports Simple Approach Sourcery **Transformers Foundation**









Innovative by nature



In addition, this research was also supported by:

Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH, GIZ, FABRIC Asia and **Transformers Foundation**



Introduction UPDATE D

a. Objective

In July 2023 the first iteration of this guide covering, 12 pieces of legislation, was published. This document is an update to that guide and includes updates to the 12 factsheets issued last year as well as three additional factsheets covering new legislation not previously included.

This document is intended to enable suppliers in the apparel value chain that are established or headquartered outside of the Global North¹, or whose operations are based outside these jurisdictions or whose supply chains extend to the Global South, to better understand how sustainabilityrelated legislation in the Global North could potentially impact them. While suppliers may not, in all cases, be directly subject to the obligations created by these Global North

laws, they may still experience knock-on effects as they form an integral part of the global apparel value chain and produce goods for multinational brands and retailers who have increasing compliance obligations as they adopt new practices in order to respond to the increased legislation. As such, this document aims to:

- Offer a public resource and roadmap for suppliers to proactively respond to and prepare for the requirements of these Global North laws.
- Provide a platform for dialogue and information exchange where suppliers and manufacturers can explore engagement (where possible) with policy makers in Global North jurisdictions.
- Support suppliers in delivering the fashion industry's social and environmental performance goals, and drive meaningful change for rights holders - whether workers, local communities, cotton farmers- globally.

b. Important legislative context to understand

As governments in the Global North embark on ambitious plans to transition towards climate neutrality, inclusive and sustainable growth, the body of sustainability legislation is expanding rapidly.

The European Union (EU) is at the forefront of these changes, introducing a plethora of legislative and non-legislative measures to implement priority policies such as the European Green Deal. The European Green Deal is a cornerstone of the EU's industrial strategy, comprising a series of proposals to make the EU's climate, energy, transport, and taxation policies fit for reducing net greenhouse gas emissions by at least 55% by 2030, and to secure the global competitiveness and resilience of European industry². There are also sectorspecific initiatives such as the EU Strategy for Sustainable and Circular Textiles, which aim to implement the commitments made

¹ For the purposes of this document, "Global North" encompasses the European Union, United Kingdom, and the United States. ² European Commission, <u>A European Green Deal</u>

under the European Green Deal (see infographic on the next page "Snapshot of the Legislative Landscape in the **Global North**"), by setting out measures to address the design and consumption of textile products, and promote a greener and fairer value chain in the textiles industry. The legislations covered in this document such as the EU Ecodesign for Sustainable Products **Regulation and Digital Product Passport**, EU Corporate Sustainability Due Diligence Directive, EU Regulation on Prohibiting Products Made With Forced Labour on the Union Market (Forced Labour Regulation), are only some of the initiatives taken by the EU to execute on the European sustainability policy objectives³.

These legislations create legally binding obligations on companies to consider how they are managing their social and environmental impact. Many of these laws and regulations have global application and/or will impact apparel manufacturing and sourcing hubs outside of the Global North. As such, while these laws originate from the Global North such as the EU, United Kingdom, and United States, they will impact companies operating outside of these jurisdictions. It is therefore a prescient time for companies directly subject to these legislations, and for those who have business relationships with them, to align their sustainability policies and practices with these laws.

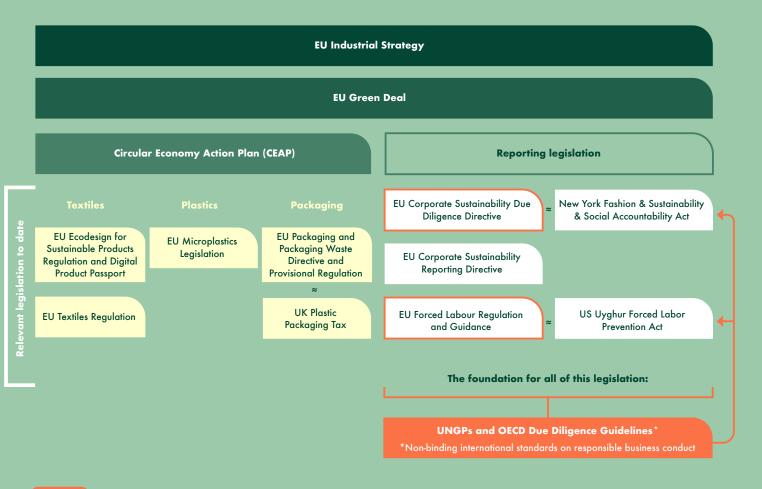
At a high level, these laws (especially those relating to mandatory human rights due diligence) can be collectively understood as a legal framework that translates elements of the United Nations Guiding Principles on Business and Human Rights (UNGPs) into binding legal obligations. The UNGPs represent the authoritative framework on how businesses should operationalize their commitments to human rights. As businesses are increasingly required to comply with different (and sometimes overlapping) laws in this area, it is The Remedy Project's view that businesses that are able to operate in accordance with the UNGPs and other international frameworks such as the OECD Due Diligence Guidance for Responsible Business Conduct will be more successful in making this transition. Complying with the highest international standards could help future-proof business against future legislative changes and may also be more efficient from a process perspective. Furthermore, the Remedy Project sees a trend of many

brands upgrading their internal compliance and value chain requirements based on the UNGPs and international frameworks. Thus, complying with these international standards could help businesses position themselves to align with brands' expectations and easily and effectively adapt to future legislative requirements, as well as satisfy the requirement of other business partners and customers. Instead of having to operate in accordance with different standards of compliance for each jurisdiction and each counterparty, the business can adopt a less fragmented, and thus less burdensome, approach to compliance. Of course, even if suppliers align with established international frameworks, different brands will continue to set varying detailed procedural requirements on their supply chain partners, particularly in the near future. We therefore continue to recommend that suppliers proactively work with brands and retailers on implementation to reduce the risk of multiple interpretations.

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³ See for example the summaries of EU legislation on environment and climate change.

Snapshot of the Legislative Landscape in the Global North



Note * The legislations, regulations and directives in this diagram are not the complete set laid out under the umbrella strategies. Head to the <u>European Commission</u> website to learn more. c. General implications forcompanies supplying apparel& beyond

These legislative developments make clear that businesses will need to re-think the way they approach sustainability. This new era of legislation moves sustainability from "nice to have" to "must-have" and requires companies to implement human rights and environmental risk management practices. With this transition, we expect to see more cross-functional efforts to embed considerations of human rights and environmental impacts into business' day-to-day operations and overall strategy. In this new landscape, inhouse legal teams must work closely with procurement and sourcing, operations, product teams, and in-house sustainability experts to achieve compliance. There must also be executive and management level buy-in, and attention given to sustainability issues.

How to Use This Document

This document comprises a series of factsheets. For each legislation, the factsheet will cover the following topics on the right.

Updates to Factsheets will be identified by these indicators:



Text Updates

1. Key Changes	A summary of key changes to the legislation since August 2023.
2. Overview	A summary of the key aspects of the legislation.
3. Context	A description of the political context and policy objectives that the legislation seeks to address or achieve.
4. Status	Whether the legislation is in effect and if not, the current stage of the legislative procedure. If known, the expected timeline for implementation is also provided. For proposed EU legislation, users may find it helpful to refer to the <u>European Parliament's infographic</u> for information on the different stages of the EU legislative procedure.
5. Scope	This section sets out the types of companies or products that fall within the scope of the legislation. This may include, for example, an explanation of the thresholds that a certain company must meet for the legislation to

scope of the legislation. This may include, for example, an explanation of the thresholds that a certain company must meet for the legislation to apply. Our suggestion to suppliers is to start by identifying whether they are directly in-scope and, if so, review the obligations and compliance recommendations for companies in-scope (Sections 5 & 6). If a supplier has established that they are not directly in-scope, it is our suggestion that those suppliers review whether the brands for which they produce are in scope. If a supplier's customer is within scope, our suggestion is to review the potential implications for suppliers to companies in-scope (see Section 7).

6. Obligations for companies in-scope

7. Compliance recommendations for companies in-scope A description of the duties and responsibilities that must be undertaken by the companies that are directly subject to the legislation.

Suggested recommendations for companies to prepare for compliance with the legislation (where the legislation is not yet in effect), or considerations for companies seeking to improve their compliance (where the legislation is already in effect). For the avoidance of doubt, these compliance recommendations do not constitute legal advice or opinion; companies should seek legal advice from attorneys concerning any specific situation or legal question they may have. Moreover, as the text of the laws in many cases remains subject to change, companies should refer to the most updated version of the legislation in developing their compliance strategy. The enforcement actions undertaken by the relevant regulator (once the law is in effect) will also determine the scope of compliance obligations.

8. Potential implications for suppliers to companies in-scope

In some instances, suppliers in the apparel value chain who are not directly subject to the concerned legislation, may still be impacted by the legislation as they supply to companies in-scope (i.e., a fashion brand or fashion retailer in-scope). These may include requirements around transparency and traceability, or obligations to undergo audits or obtain certifications. This section sets out the potential implications of the legislation for suppliers. For the avoidance of doubt, companies in-scope will approach compliance differently and many of the legislations covered in this document are in nascent stages of development. Moreover, the enforcement actions undertaken by the relevant regulator will also affect how companies inscope respond to the legislation. As such, the guidance provided herein is only intended to represent our best estimates of the knock-on effects of the concerned legislation and is for informational purposes only.

9. Penalties for non-compliance

10. Form of Enforcement

to comply with the legislation are set out.

A description of the key forms of enforcement action that may be taken by the relevant authorities.

Where applicable or known, the penalties for companies in-scope that fail

11. Reporting/ disclosure for companies in-scope

12. Access to remedy mechanisms and litigation risk An overview of the key information disclosure obligations (if any) for companies in-scope.

This section notes where the relevant legislation provides a right for legal action to be taken against a company for alleged non-compliance.

13. Opportunity to participate and engage in legislative development

14. Useful resources to support compliance

Where applicable, opportunities to participate in public consultation.

Links to third-party resources and guidance are provided for further detail on how companies in-scope may approach compliance and how suppliers or business partners to companies in-scope may prepare for cascaded compliance requirements.

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Glossary

A glossary of key terms used in this document is set out below.

Brands: For the purposes of this document, this refers to a multinational company that is engaged in the business of offering branded apparel products.

Companies in-scope: Companies that are directly subject to the obligations set out in the relevant legislation.

Due Diligence: A process that businesses should carry out to identify, prevent, mitigate, and account for how they address the actual and potential adverse human rights or environmental impacts in their operations, their value chain and other business relationships.

EU Decision: A "decision" is binding on those to whom it is addressed (e.g., an EU country or an individual company) and is directly applicable.⁴

EU Delegated Act: A delegated act is an EU legislative mechanism to ensure that EU

laws that are passed can be implemented properly or reflect developments in a particular sector.

EU Directive: A directive is a legislative act that sets out a goal that all EU countries must achieve. However, it is up to the individual countries to devise their own laws on how to reach these goals⁵.

EU Regulation: A regulation is a binding legislative act. It must be applied in its entirety across the EU⁶.

EU negotiation position: A particular stance taken by a European Institution in a negotiation where it outlines the preferred result.

EU provisional agreement: When after negotiations, an informal agreement is reached on the text of a legislative proposal that then needs to be formally approved by the European Parliament and the Council of the European Union during the legislative procedure.

Adopted: When a law is officially approved at the end of the legislative procedure.

Approved: Used as a synonym for adopted or used in cases of approval of draft versions of the law.

Derogated: Not included or not applied.

European Commission: The European Commission is the EU's politically independent executive arm. It is responsible for drawing up proposals for new European legislation, and it implements the decisions of the European Parliament and the Council of the EU.

European Council: The European Council is the EU institution that defines the general political direction and priorities of the European Union.

European Parliament: The European Parliament is the EU's law-making body that is directly elected by EU voters every 5 years.

Grievance Mechanism: Any routinized, State-based, or non-State-based, judicial or non-judicial process through which grievances concerning business-related human rights abuse can be raised and remedy can be sought⁷.

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^{4,5,6} European Union, Types of legislation ⁷ UNGPs Principle 25 and commentary

Supplier: For the purposes of this document, unless otherwise specified, this refers to a supplier in the apparel value chain. While the information provided herein is applicable across the entire value chain, it is primarily intended for Tier 1 suppliers and sub-contractors who produced finished goods for fashion brands and retailers, and Tier 2 suppliers and sub-contractors who provide services and goods, such as knitting, weaving, washing, dyeing, finishing, printing for finished goods, and components (e.g., buttons, zippers, soles, down and fusible) and materials for finished goods.

Value Chain: A value chain encompasses all activities related to the production of goods or the provision of services by a company, including the development of the product or the service and the use and disposal of the product as well as the related activities of upstream and downstream business relationships of the company.

Intentionally added: Deliberately utilized in the formulation of a material or component where its continued presence is desired in the final product to provide a specific characteristic, appearance or quality.

UPDATE

Types of EU legislation

Directive:

A legislative act that sets out a goal for EU countries who then have to devise their own laws on how to reach these goals.

Regulation:

A binding legislative act which must be applied in its entirety across the EU.

Decision:

A binding law only on those to whom it is addressed (e.g. an EU country or an individual company) and is directly applicable (it does not have to be implemented by the recipient.

Delegated and Implementing Acts:

Non-legislative acts adopted by the European Commission aimed at supplementing elements of a legislative act for uniform implementation.

EU Microplastics Regulation

UPDATE

1. Key Updates

The Microplastics Proposal passed the 3-month scrutiny of the European Parliament and the Council and was adopted on September 25, 2023. The first of the new measures, including a ban on loose glitter made of plastic for textile purposes (with exceptions), entered into force on October 17, 2023, see Section 5 for more details. The Commission is expected to issue a detailed Q&A to support the implementation of the new rules.¹

¹ The timeline is undefined.

2024 Edition

Factsheet

2. Overview

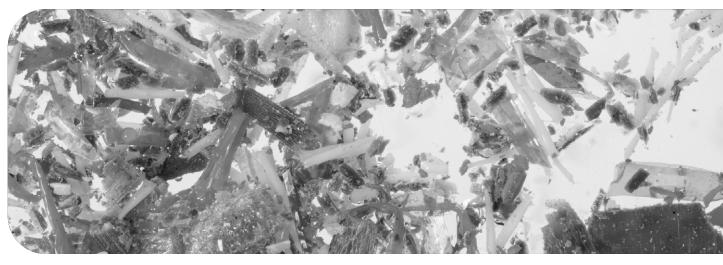
The Commission Regulation (EU) 2023/2055 of September 25, 2023 (the Microplastics **Regulation**)² is a legislative initiative which aims to reduce the intentional release of microplastics in the environment. In doing so, the Microplastic Regulation hopes to ultimately reduce environmental pollution and potential risks to human health. The **European Chemicals Agency (ECHA)** estimates that more than 42,000 tons of microplastics intentionally added to products are released in the EU every year. The Microplastics Regulation is expected to result in a 70% reduction of quantified emissions (500,000 tons over 20 years) that would otherwise occur.

3. Context

The European Commission has been working on tackling plastic pollution for a long time. To reduce all sources contributing to microplastic pollution, the European Commission published the European Green Deal, the new Circular Economy Action Plan (CEAP) and the Zero Pollution Action Plan. The latter includes a target to reduce microplastic emissions by 30% by 2030.

The European Commission requested the European Chemicals Agency (ECHA) to prepare a restriction dossier concerning the use of intentionally added microplastics to consumer or professional use products. In parallel, the CEAP presented a set of initiatives to establish a comprehensive and sustainable product policy framework to address the release of microplastics. To this end, the European Commission will address the presence of microplastics into the environment.

The ECHA concluded that microplastics intentionally added to certain products are released into the environment in an uncontrolled manner, and recommended restricting them. Based on this evidence, the Commission drafted the Microplastics Proposal that was adopted on September 25, 2023.



An Apparel Supplier's Guide 2.0: Key Sustainability Legislation in the EU, US, and UK

² 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.

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4. Status

² Specified in Article 1(2) of the ESPR



UPDATE

The European Commission published the Microplastics Proposal on August 30, 2022. The Registration, Evaluation, Authorisation, and Restriction of Chemicals (REACH) Committee discussed the Proposal on September 23, 2022, and again on March 1, 2023.

The Microplastics Proposal passed the 3-month scrutiny of European Parliament and the Council, and was adopted on September 25, 2023 under the Commission Regulation (EU) 2023/2055 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 to synthetic polymer microparticles.

The first of the new measures, including a ban on cosmetics containing microbeads and loose glitter, entered into force on October 17, 2023. Other measures will come into force in stages, giving affected stakeholders time to switch to alternatives.

Most recently, on January 29, 2024, the European Council and European Parliament reached a provisional political agreement on a proposal to remove microplastics and other micropollutants from urban wastewater. Under this proposal, at least 80% of the costs needed to remove pollutants in the sewage treatment process would be covered by pharmaceutical and cosmetic producers, in line with the 'polluter pays' principle. By 2045, the provisional agreement would require EU member states to remove a broad spectrum of micropollutants from urban wastewater before is released into the environment.

This provisional political agreement would have a significant financial impact on producers of cosmetics, chemicals, and medicines in the European Union. Under the proposal:

- companies would have to cover the costs of gathering and verifying data on how their products impact wastewater;
- there would be potential cost implications arising from product reformulation to meet the proposed environmental risk minimisation requirements; and

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new product formulations would be subject to regulatory scrutiny by medicines regulatory authorities, to ensure compatibility with the new requirements without adversely affecting the safety, quality, and efficacy of the reformulated products.

As a next step, the provisional agreement will be submitted to the EU members' representatives with the European Parliament's Environment Committee. Then, if formally adopted by both institutions, the directive will be published in the European Union's Official Journal. Considering that the Microplastics Regulation states that "a big part of microplastic pollution forms unintentionally, for example as a result of [...] the washing of synthetic clothes" and that the EU Environment Agency says that "about 8% of European microplastics released to oceans are from synthetic textiles and the percentage of microplastics deriving from washing textiles is even higher", it is likely that further legislative developments will address the issue.

Certain types of products are derogated from the sale ban:

- Products that contain microplastics but do not release them or their release can be minimised (e.g. construction materials);
- Products used at industrial sites; and
- Products already regulated by other EU legislation (e.g. medicinal products, food and feed).
- While these products can still be sold, their manufacturers will have to (i) report the estimated microplastic emissions from these products to the ECHA annually and (ii) provide instructions on how to use and dispose of the product to prevent microplastics emissions.

UPDATE) 5. Scope

The Microplastics Regulation applies to manufacturers, importers, and industrial downstream users of microplastics and of products within the scope of the legislation. The Microplastics Regulation adopts a wide definition of microplastics, covering all synthetic polymer particles below 5mm that are organic, insoluble and resist (bio) degradation.



As outlined above, the Microplastics Regulation includes transitional periods aimed at providing sufficient time for businesses to comply with the restriction and transition to suitable alternatives. More specifically, the Microplastics Regulation sets the following transitional periods:

Immediately (from October 17, 2023) for microplastics themselves and when intentionally added (e.g. to certain cosmetics and loose glitter);

4 years after the entry into force (from October 17, 2027) for the use of microplastics in rinse-off cosmetic products;

5 years after the entry into force (from October 17, 2028) for the use of microplastics in detergents/waxes/polishes and air care products, fertilizing products outside the scope of application of Regulation (EU) 2019/ 1009, for products for agricultural and horticultural uses;

6 years after the entry into force (from October 17, 2029) for the use of microplastics in the encapsulation of fragrances, leave-on cosmetic products, medical devices within the scope of Regulation (EU) 2017/745, granular infill for use on synthetic sports surfaces;

8 years after the entry into force (from October 17, 2031) for the use of microplastics in plant protection products and biocidal products; and

12 years after the entry into force (from October 17, 2035) for the use of microplastics in lip products, nail products and make-up (additionally, from October 17, 2031 until October 16, 2035, suppliers of these products must include the following statement on the label or packaging of the product: 'This product contains microplastics').

6. Obligations for companies within scope

The Microplastics Regulation **prohibits** the placement of synthetic polymer microparticles (**microplastics**) on the market on their own or, where the microplastics are **intentionally added** to confer a sought-after characteristic, in mixtures in a concentration equal to or greater than 0.01% by weight.³ This would include (but is not limited to) use of microplastics cosmetic products or detergents/waxes/polishes and air care products. Specifically, the sale of non-biodegradable, insoluble plastic glitter for textiles purposes is banned when glittered articles serve purely or primarily a decorative function and the glitter can detach from the article under normal use.

Certain uses and sectors are excluded from this prohibition:

- i. textiles in case the decorative function of the product containing glitter is secondary microplastics for use at industrial sites
- ii. medicinal products within the scope of Directive 2001/83/EC of the European Parliament and of the Council and veterinary medicinal products within the scope of Regulation (EU) 2019/6 of the European Parliament and of the Council
- iii. EU fertilizing products within the scope of Regulation (EU) 2019/1009 of the European Parliament and of the Council
- iv. food additives within the scope of Regulation (EC) No 1333/2008 of the European Parliament and of the Council
- v. in-vitro diagnostic devices (if potential release can be minimized by setting conditions of use and disposal)
- vi. microplastics that are both (a) contained by technical means throughout their whole life cycle and (b) microplastic containing wastes arising are incinerated or disposed of as hazardous waste
- vii. microplastics that permanently lose their particle form
- viii. microplastics that are permanently enclosed in a solid matrix during end use.

³ Polymers that occur in nature and that have not been chemically modified and polymers that are biodegradable are excluded.



Any manufacturer, importer or downstream user responsible for placing a substance or mixture containing a microplastic falling within the exclusions set out in (i), (ii), (vi), (vii) or (viii) above must ensure that the label, safety data sheet, or instruction, provides any relevant instructions for use to avoid releases of microplastics to the environment, including at the waste life-cycle stage. The instructions must be clearly visible, legible, and indelible and the label written in the official language(s) of the EU country or countries where the substance or mixture is placed, unless the concerned country or countries provide(s) otherwise.

7. Obligations for companies in-scope

The Microplastics Proposal shall not have direct effects on manufacturers of textile products for the apparel industry, as it only addresses the intentional use of microplastics in products. While textiles products are a major source of microplastics pollution, the release of microplastics from textile products (also referred to as microfibres) primarily originate from the washing of synthetic textiles during textile manufacturing, garment wearing and end-of life disposal. This form of microfiber release or shedding is categorized as unintentional release of microplastics, and therefore does not fall within the scope of this Microplastics Regulation.

However, more broadly, this legislative initiative highlights that regulatory bodies are actively engaged in addressing microplastics pollution. Although there are currently no EU regulations that address microfibres unintentionally released by textiles, future regulation curbing plastic microfibre pollution is expected. For example, France has already taken legislative steps to regulate microfibre pollution through the introduction of the Anti-Waste for a Circular Economy Law. The UK is reportedly working on a similar bill to address microfibre pollution. In addition, the EU strategy for sustainable and circular textiles also confirms that the European Commission intends to address the unintentional release of microplastics from synthetic textiles.

8. Potential implications for suppliers

See discussion in Section 6 above.

10. Form of enforcement

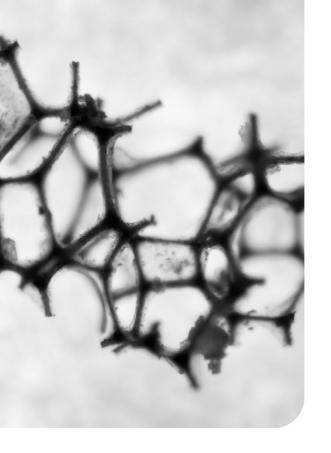
The ECHA has no enforcement responsibilities; therefore, enforcement of REACH regulations is a national responsibility. Each EU country must put in place an official system of controls and adopt legislation specifying penalties for non-compliance with the provisions of REACH.

9. Penalties for non-compliance

Not applicable.

11. Reporting/ disclosure requirements for companies in-scope

Importers or downstream users that place products falling within certain excluded uses/sectors shall be subject to reporting requirements. They will be required to send the identity of the polymer(s) used, a description of the use of the microplastic, the quantity of microplastics used in the previous year, and the quantity of microplastics released to the environment (either estimated or measured in the previous year) to the ECHA. The proposed reporting requirement is expected to help ensure that significant emissions are not occurring from the excluded uses/sectors.



12. Access to remedy mechanisms and litigation risk

Not applicable.

13. Opportunity to participate and engage in legislative developments

The Microplastics Regulation was open to public consultation from February 22, 2022 to May 17, 2022. There are no current opportunities to participate and engage in the legislative process.

14. Useful resources to support compliance

European Commission, Comitology Register, <u>COMMISSION REGULATION (EU) .../... of</u> XXX 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

ECHA, Annex XV Restriction Report Proposal for a Restriction (2019)

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