

**From:** [REDACTED] (GROW)  
**Sent:** 07 December 2017 17:07  
**To:** PETTINELLI Carlo (GROW); [REDACTED] (GROW); [REDACTED] (GROW)  
**Cc:** [REDACTED] (GROW); [REDACTED] (GROW-EXT); [REDACTED] (GROW); [REDACTED] (GROW); [REDACTED] (GROW); [REDACTED] (GROW); GROW [REDACTED]  
**Subject:** Cosmetic Europe - Meeting on 5 December 2017

Participants:

Cosmetic Europe (CE): [REDACTED]  
 GROW.D: [REDACTED]

Microplastics/Microbeads

- GROW informed that mandate was sent to ECHA to prepare an annex XV dossier as a first step towards a possible restriction of microplastics (synthetic, water-insoluble polymers of 5mm or less, intentionally added to a range of products). The request is planned to be published on the ECHA RoI once the Plastic Strategy is adopted.
- CE recognises and understands the political debate and the public concerns
- CE believes that request is disproportionate, as microbeads contribute only marginally to the pollution of the aquatic environment; furthermore, CE has recommended its members already in 2015 to remove microbeads for exfoliating and cleansing in wash-off cosmetic and personal care products. To date, 82 % of microbeads have already been removed and it is planned that by 2020 they will be completely phased out. Alternatives exist for microbeads, however any measure going beyond microbeads would result in high reformulation costs and economic burden.
- GROW explained the restriction process, including public consultation phase. We clarified as well that an Annex XV dossier can also conclude that no restrictions at EU level are required. GROW explained that opinions from RAC and SEAC will only be available by end 2019/beginning 2020 and that only at that stage measures can be prepared.
- CE enquires whether ECHA will make a public call for evidence – [REDACTED] will ask ECHA and provide reply to CE.
- CE expressed concerns about the potential scope of the request: fear is that apart from microbeads also microplastics used in rinse-off and leave-on-products may be affected (according to CE only marginal

tonnage in comparison to microbeads) which are not released into the marine environment as they are captured by normal waste system. In this case restriction measures would create trade disruptions as e.g. CDN and US only address microbeads in wash-off-products.

#### Single use plastics

- CE wanted to know whether it is envisaged in the Plastics Strategy to consider intentionally added microplastics in cosmetics as single-use plastics. GROW expressed its surprise and explained that although Commission internal discussion process is still ongoing, such possibility was not envisaged during the preparatory work.

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