



Brussels, 01 December 2025

Guidance and assistance on the implementation of the restriction on synthetic polymer microparticles (Regulation [EU] 2023/2055)

Background

Synthetic polymer microparticles (SPM) were included as entry 78 in Annex XVII of REACH by Regulation (EU) 2023/2055 on 27 September 2023 and are thus subject to a restriction. The restriction was prompted by concerns about the general impact of microplastics on the environment and possibly on human health. The restriction aims to limit the environmental input of primary manufactured microplastics.

Implementation deadlines

The regulation on the inclusion of the restriction of synthetic polymer microparticles in Annex XVII of the REACH Regulation was published in the Official Journal of the European Union on 27 September 2023. This results in the following implementation deadlines:

Publication in the Official Journal of the European Union	27/9/2023
Entry into force of the restriction	17/10/2023
Instructions and additional information for downstream industrial users	17/10/2025
Instructions for professional users and the general public	17/10/2025
Annual reporting obligations to ECHA, for the first time	31/5/2027
Annual reporting obligations to ECHA on 31 May of each year	

Detailed information on duties and instructions can be found in Chapter 4 of this guide.

Scope

The restriction prohibits the placing on the market of synthetic polymer microparticles as such and of mixtures in which synthetic polymer microparticles are present in concentrations equal to or greater than 0.01% by weight to impart a desired property. Unless exemptions apply to the polymer or the use or end-use, this applies from the entry into force of the restriction.

The scope is limited to polymers that are solid under standard conditions (20 °C; 101.3 kPa).

'Synthetic polymer microparticle' means a solid polymer which forms a part of a particle and for which one of the following conditions is met in order to be within the scope of the restriction:

- The polymer is present in the particle at least 1% by weight
- Or the polymer forms a continuous surface coating of the particle

In addition, at least 1% by weight of the above particles must meet one of the following size requirements:

- All dimensions of the particles are equal to or smaller than 5 mm
- Length of the particles is 15 mm or less, and the length to diameter ratio is greater than 3

The following polymers are completely exempt from the restriction:

- Chemically unmodified polymers whose polymerisation has taken place in nature
- Degradable polymers, where degradability must be demonstrated according to a test method specified in Annex 15 of the restriction
- Water-soluble polymers which must have a solubility greater than 2 g/l, the solubility being demonstrated by a test method specified in Annex 16 to the restriction
- Polymers that do not contain carbon atoms (not even in side chains)

It is important to note that from a quantitative perspective the SPM is not the particle as a whole but only the polymer part in that particle. This is relevant

- For the concentration limit in mixtures mentioned at the beginning of this chapter
- For the Information requirements for industrial customers regarding the quantity or, as applicable, concentration of synthetic polymer microparticles in the mixture
- For the estimation of emissions in the reporting to ECHA (see chapter 4)

A schematic overview of the scope criteria is shown in Scheme 1 (Appendix).

Exemptions from the prohibition of placing on the market

Exemptions from the prohibition of placing on the market apply to certain uses or end-uses (see also Scheme 2, Annex). For construction chemical products, sealants, adhesives and adhesive tapes as well as paints, varnishes and printing inks, the following exemptions are relevant:

- a) Use of SPM and SPM-containing mixtures at industrial sites (paragraph 4 [a] of the restriction text)
Example: Use of SPM as raw materials in formulations by industrial downstream users (e.g. formulators of mixtures)
- b) SPM whose physical properties are permanently modified during intended end-use in such a way that the polymer is no longer within the scope (paragraph 5 [b] of the restriction text)
Example: Flooring products where the SPMs form a film
- c) SPM that are permanently incorporated into a solid matrix during intended end-use (paragraph 5 [c] of the restriction text)
Example: 1K adhesives where SPMs are incorporated in the adhesive matrix during curing
- d) SPM that are contained by technical means so that releases into the environment are prevented when SPM are used in accordance with the instructions for use during the intended end-use (paragraph 5 [a] of the restriction text)
Example: Threadlock lubricant SPM (e.g. PE) that are technically enclosed during use

In these cases, the placing on the market and the use of the SPM and SPM-containing mixtures are still permitted. However, the labelling and information obligations as well as annual notification obligations will apply and will have to be fulfilled by the supplier and industrial downstream user of the SPM or the mixtures containing SPM.

Obligations of manufacturers, suppliers and formulators

Labelling and information requirements for industrial users

If SPM and SPM-containing mixtures are placed on the market for use at industrial sites (see paragraph 4 [a] of the restriction text), the supplier must provide the information listed below to industrial downstream users (see paragraph 7 of the restriction text):

- Instructions for use and disposal for industrial downstream users explaining how to prevent the release of synthetic polymer microparticles into the environment (in the form of clearly visible, legible and indelible text or, where appropriate, in the form of pictograms), e.g. in section 7 and/or 13 of the Safety Data Sheet (SDS).
- A note in section 15 of the SDS: *‘The synthetic polymer microparticles supplied are 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’*
- Information on the amount or, where appropriate, the concentration of synthetic polymer microparticles in the substance or mixture. This should be communicated as accurately as possible (without violating confidential business information) to avoid overestimation in further calculations down the supply chain, e.g. in section 3 of the SDS
- General information on the nature of the polymers contained in the substance or mixture, enabling manufacturers, industrial downstream users and other suppliers to comply with their obligations under paragraphs 11 and 12, e.g. in section 3 of the SDS. CEFIC is providing a list of generic names for polymers in agreement with ECHA. Only these terms should be used (see Appendix 1)

Instead of the above recommendations for inclusion into the SDS, a company may also provide this information by other means (leaflet, label, letter, etc.). The legal text of the restriction does not contain any detail on the communication pathway.

If this information is provided in the supply chain, the industrial **recipient** company is obliged to report to ECHA itself (see below).

Labelling and information requirements for professional users or the general public

Suppliers placing SPM-containing products on the market for professional users and the general public according to paragraphs 5 [a]-[c] of the restriction text must provide the following information (see paragraph 8 of the restriction text):

- Instructions on use and disposal to prevent the release of the SPM into the environment
- Preferably, pictograms shall be used to avoid translations. For suggested pictograms, see Appendix 2.

Beyond referring to restriction entry 78 in chapter 15 of the SDS, there is no explicit reference required about contained SPM for professional users and the general public.

The information covered in this chapter shall be presented in the form of text or pictograms to be included on the label, on the packaging or as a package leaflet.

Information in text form must be written in the official languages of the Member States in which the substance or mixture is placed on the market, unless otherwise regulated by the member states (see paragraph 10 of the restriction text). These information requirements apply from 17/10/2025.

If this information is provided in the supply chain, the industrial **supplier** company is obliged to report to ECHA also the uses of its customers (see below).

Content of the Instructions for use and disposal (IFUD) to avoid release to the environment

In general, the following scenarios could be relevant with regard to releases to the environment to be avoided:

- When packaging and tools are washed, SPM could be released into the environment via the sewage system (down the drain)
- Direct release into the environment could occur, e.g. through dust drift
- Spilled material containing SPM could be released into the environment

Depending on the product and its (intended) use, the relevant release scenarios must be identified and corresponding information included in the IFUD in text form or as a pictogram.

Examples of possible text phrases or pictograms can be found in Appendix 2. The selection of pictograms is still incomplete and may be supplemented at a later date by the updating of this guide.

Annual obligation to notify ECHA (not yet finally defined by ECHA, may be adapted)

Manufacturers of SPM and industrial downstream users (e.g. formulators) of SPM at **industrial sites** must submit the following information per legal entity to ECHA by 31/5 of each year (see paragraph 11 in the restriction text). According to the established transition periods, the annual notification must be submitted for the first time for the reporting year 2026 by 31/5/2027 and, from then on, annually by 31/5. It should include:

- A description of the uses of SPM in the previous calendar year. ECHA is providing a drop-down list of uses, which are:
 1. Manufacture or use of pellets, flakes and powders used as feedstock for plastic manufacturing at industrial sites
 2. **Other manufacture or use at industrial sites (including formulation)**
 3. Consumer and/or professional use in medicinal and veterinary medicinal products
 4. Consumer and/or professional use in food additives
 5. Consumer and/or professional use in in vitro diagnostic devices
 6. **Other consumer and/or professional use**

In the adhesives and sealants industry only the uses shown in 'bold' are typically relevant

- For each of these uses generic information on the identity of polymers (see Appendix 1)
- For each of these uses, an estimate of the quantity of SPM released into the environment of the European Economic Area (EEA) per legal entity in the previous calendar year, including during transport, as a single figure in kg
- For each of these uses of SPM, a reference to the derogation laid down in paragraph 4 (a) of the restriction text

Suppliers of products that have placed SPM on the market **for professional users and/or the general public** must submit the following information, per legal entity, to ECHA by 31/5 of each year - in addition to the previously listed information (see paragraph 12 of the restriction text). According to the established transition periods, the annual notification must be submitted for the first time for the reporting year 2026 by 31/5/2027 and from then on, annually by 31/5:

- A description of the end-uses for which the SPM were placed on the market in the previous calendar year based on the drop-down list mentioned above

- For each of these end-uses, generic information on the identity of polymers placed on the market (see Appendix 1)
- For each of these end-uses, an estimate of the quantity of SPM released into the environment of the European Economic Area EEA in the previous calendar year, including during transport, as a single figure in kg
- For each of these end-uses, a reference to the applicable derogation laid down in paragraph 5 (a), (b) or (c) of the restriction text

At this stage, it is still unclear in what form the information is to be submitted to ECHA. ECHA proposes the use of IUCLID, which will be adjusted accordingly. ECHA's approach is still being challenged by industry due to the complexity of IUCLID

Information at the request of the authorities

Manufacturers, importers and industrial downstream users of products containing SPM must provide specific information to competent authorities upon request (see paragraph 14 of the restriction text). This information includes:

- Type of polymers present as SPM in these products, which information shall include, where applicable, at least that specified in points 2.1 to 2.2.3 and 2.3.5 to 2.3.7 of Annex VI to REACH (including CAS number, IUPAC name, molecular weight and various analytical data)
- Function of these polymers in the products

If this information is not available to the industrial downstream users, it must be requested from the supplier within seven days, and the authorities must be informed. Suppliers, in turn, have 30 days to provide the information either directly to the authorities or to industrial downstream users.

In addition, manufacturers, importers and industrial downstream users are under the obligation to provide evidence upon request by authorities if potential synthetic polymer microparticles have been exempted from the restriction due to solubility or degradability (see paragraph 15 of the restriction text).

After the deadline for providing information to industrial downstream users on 17/10/2025, formulators who keep the polymeric raw materials used in their product physico-chemically unchanged should refer to the assessments (including possible degradability or solubility tests) of their suppliers in the case of requests from authorities and not carry out their own assessments. One's own assessments are necessary only if the formulator specifically changes the chemical-physical properties of the polymeric ingredients, e.g. by adding a film-forming aid or making specific pH-value adjustments.

Notes on how to determine one's own level of concern

Until now, there have been no labelling or declaration requirements for SPM. Thus, formulators usually do not have the necessary information that would allow them to easily determine to what extent they are affected by the restriction. For an assessment, the formulator is therefore dependent on the information they may have to obtain from their supplier according to paragraph 7 of the restriction text. In the worst case, however, they will not receive this information until the end of the implementation period on 17/10/2025. If the formulator does not receive the relevant information from their raw material supplier until the end of the implementation period, they will not have sufficient time to meet their own information obligations towards their customers, as the same deadline applies to them as to their supplier. This case is quite realistic, as SPM suppliers sometimes

have to analyse and evaluate their products themselves through tests before they can pass on their evaluation to the customer (formulator).

In order to have sufficient time to prepare their own information and reporting obligations, formulators should therefore critically analyse their raw material portfolio and, in case of doubt, enquire proactively of the relevant supplier in good time before the expiry of the corresponding transition period on 17/10/2025 whether the raw material concerned is subject to the SPM restriction.

According to the European Polymer Dispersion and Latex Association (EPDLA), a large number of polymer dispersions and dispersible polymer powders are outside the scope of the SPM restriction (see EPDLA position paper of December 2024, link list). The position is based on the argument that the minimum film forming temperature (MFFT) can be used as a measure for the aggregate state. In this sense, polymers in polymer dispersions with a minimum film forming temperature below room temperature (approx. 20 °C) would be liquid and thus not within the scope of the restriction. In the case of redispersible powders, the polymers are usually coated by water-soluble polymers, so that, according to the EPDLA, these are also not affected by the restriction at an MFFT below room temperature.

In these cases, too, in case of doubt, it should be clarified at an early stage whether the supplier of polymer dispersions or redispersion powders agrees with the recommendation of the EPDLA and evaluates their products accordingly.

As a rule, formulators can follow the evaluation of the suppliers of the raw materials when evaluating their products. In very limited, specific cases, the assessment basis may change due to the chemically or physically altered conditions in the mixture (e.g. pH-dependent effects) in such a way that a deviating SPM assessment can be determined.

Producers of plastic granulates (e.g. hotmelt adhesive granulates) have to determine themselves whether all dimensions of at least 1% of the granulate particles are equal or smaller than 5 mm. In addition, anti-blocking agents made of PE, for example, may also fall under the restriction. Also, for granules ≤ 5 mm and anti-blocking agents, the exceptions mentioned in chapter 4 of this guidance may apply.

Estimation of emissions to the environment

E-Calc_SPM

FEICA, together with its partner associations Deutsche Bauchemie and IVK, has developed a generic emission estimation methodology (E-calc_SPM) that allows downstream users of SPM-containing products to calculate emission estimations depending on the product type. It is based on already earlier published SPERCs (Specific Environmental Release Categories), in which factors of release to the environment for substances in adhesives and sealants and for relevant life cycle steps have been derived from publicly available Organisation for Economic Co-operation and Development (OECD) documents.

Thorough background documentation is available on the derivation of these factors. Compared to substances in mixtures, SPM have specific characteristics which can be applied to these existing

factors of release to derive the estimations required by the restriction on SPM. SPM, being solid polymers, are not volatile, and their behaviour in sewage treatment plants is well understood from various investigations. In combination with statistical data on wastewater treatment across the EU, factors of release to soil and water for SPM can be calculated. An Excel sheet for simple application of this concept was developed and is attached to this guidance in Appendix 3. Based on the quantity sold for a specific use and the concentration of SPM in the product, the quantity of SPM potentially released into the environment can be calculated. For further details on the concept see Appendix 4.

It should be noted that this is still a conservative exposure assessment method that overestimates the release. Therefore, this method should be used only if more specific and realistic exposure data are not available.

Attachments

- Scheme 1: Help to assess a potential SPM (manufacturers and importers)
- Scheme 2: Help to evaluate a potential SPM from a formulator's point of view
- Scheme 3: Assistance in identifying information and reporting obligations
- Appendix 1: List of generic polymer names
- Appendix 2: Instructions for use and disposal
- Appendix 3: Excel tool for E-Calc_SPM
- Appendix 4: E-calc_SPM concept

Link list

- [Restriction text in the Official Journal of the European Union](#)
- [European Commission FAQ on the restriction on intentionally added microplastics](#)
- [European Commission Explanatory Guide](#)
- [European Commission press release 25/9/2023](#)
- EPDLA-Position '[Polymer dispersions and synthetic polymer microparticles \(December 2024\)](#)'
- [ECHA website on microplastics](#)
- [FEICA Use Map](#)

Contact

FEICA Regulatory Affairs:

Paula Diaz (p.diaz@feica.eu)

FEICA is registered in the **EU Transparency Register** with ID no. **51642763262-89**.

FEICA - Association of the European Adhesive & Sealant Industry
Rue Belliard 40 box 10, 1040 Brussels, Belgium
Tel: +32 (0) 2 896 96 00
info@feica.eu | www.feica.eu

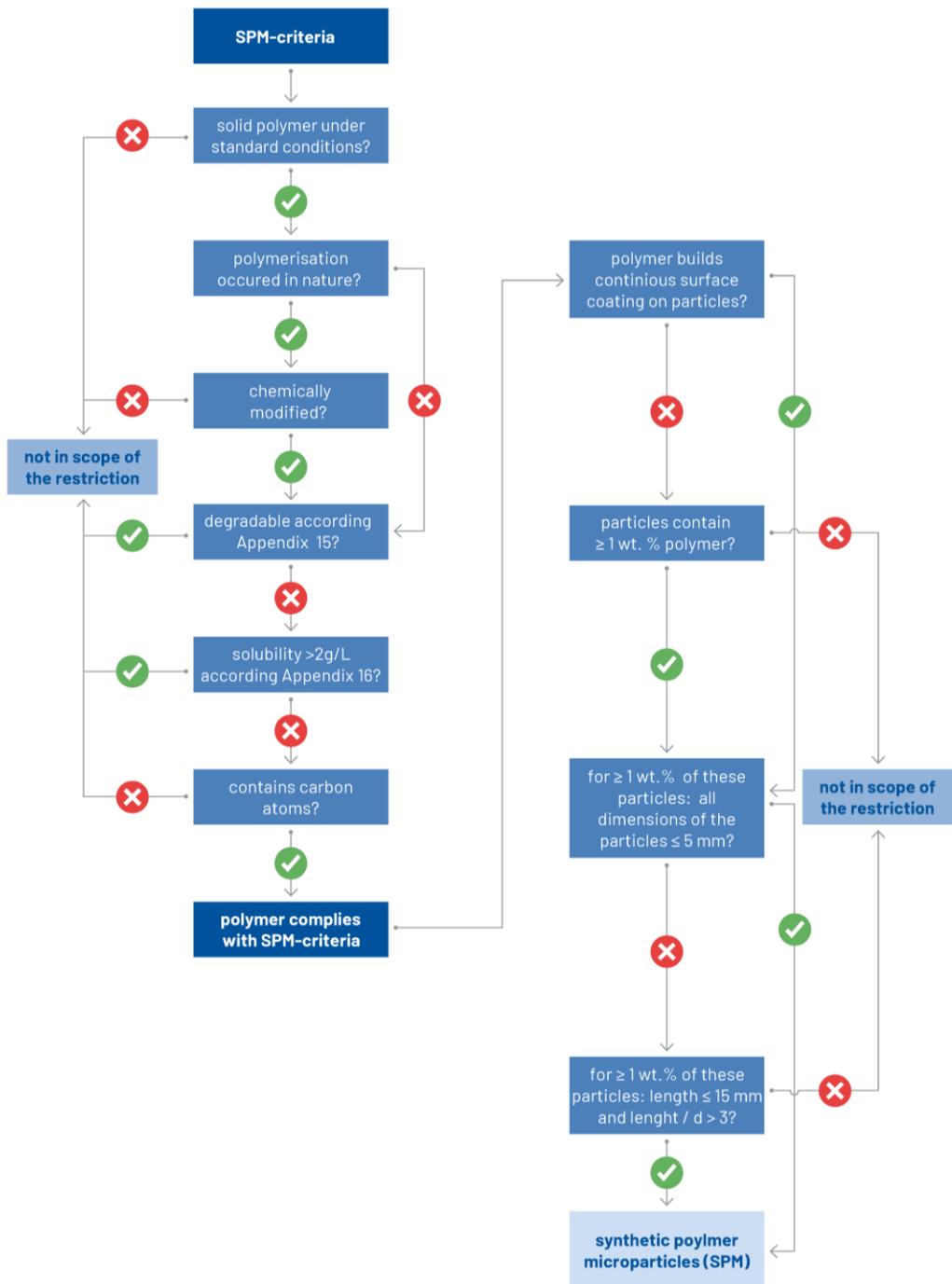
Publication ref.: GUP-EX-O04-016

This document has been designed using the best knowledge currently available, and is to be relied upon at the user's own risk. The information is provided in good faith and no representations or warranties are made with regards to the accuracy or

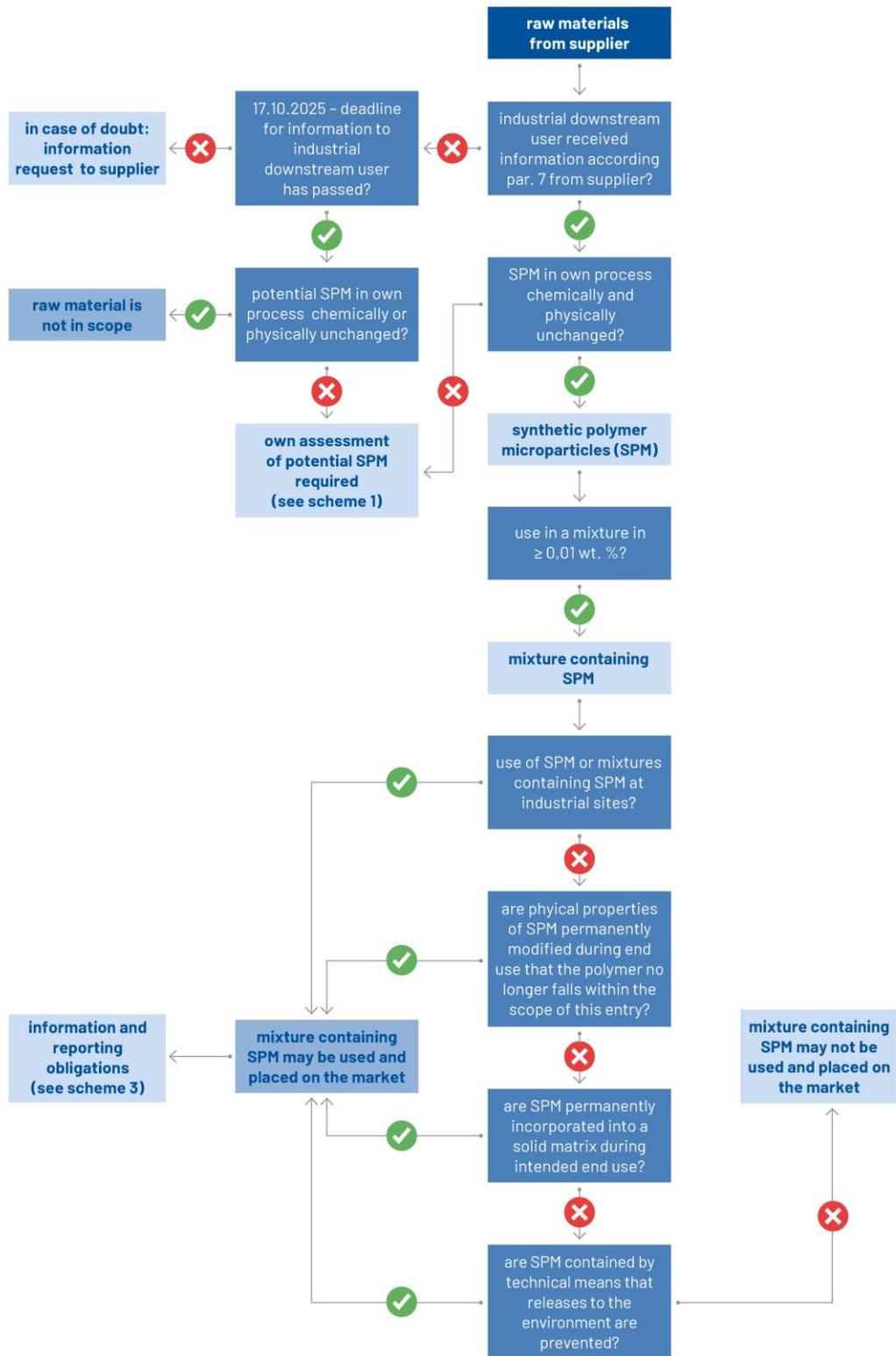
completeness, and no liability will be accepted for damages of any nature whatsoever resulting from the use or reliance on this paper. This document does not necessarily represent the views of all member companies of FEICA.

Copyright © FEICA, 2025. This document contains confidential information and is intended for FEICA members, for working i.e. internal use only. No other use may be made without the prior written permission of FEICA. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

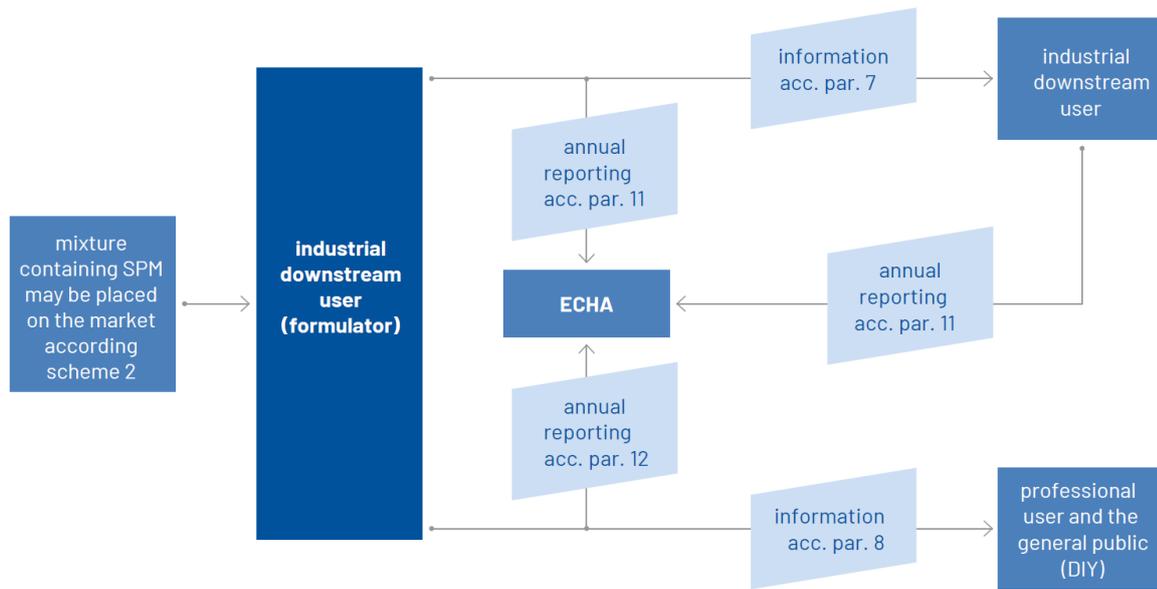
Scheme 1: Guidance for the assessment of a potential SPM (manufacturers & importers)



Scheme 2: Assistance for the assessment of a potential SPM (formulators)



Scheme 3: Assistance in identifying information and reporting obligations



Appendix 1 Generic polymer names

3806	Rosin and resin acids, and derivatives thereof; rosin spirit and rosin oils; run gums.
3901	Polymers of ethylene, in primary forms.
3902	Polymers of propylene or of other olefins, in primary forms.
3903	Polymers of styrene, in primary forms.
3904	Polymers of vinyl chloride or of other halogenated olefins, in primary forms.
3905	Polymers of vinyl acetate or of other vinyl esters, in primary forms; other vinyl polymers in primary forms.
3906	Acrylic polymers in primary forms.
3907	Polyacetals, other polyethers and epoxide resins, in primary forms; polycarbonates, alkyd resins, polyallyl esters and other polyesters, in primary forms.
3908	Polyamides in primary forms.
3909	Amino-resins, phenolic resins and polyurethanes, in primary forms.
3910	Silicones in primary forms.
3911	Petroleum resins, coumarone-indene resins, polyterpenes, polysulphides, polysulphones and other products specified in Note 3 to this Chapter, not elsewhere specified or included, in primary forms.
3912	Cellulose and its chemical derivatives, not elsewhere specified or included, in primary forms.
3913	Natural polymers (for example, alginic acid) and modified natural polymers (for example, hardened proteins, chemical derivatives of natural rubber), not elsewhere specified or included, in primary forms.
4001	Natural rubber, balata, gutta-percha, guayule, chicle and similar natural gums, in primary forms or in plates, sheets or strip.
4002	Synthetic rubber and factice derived from oils, in primary forms or in plates, sheets or strip; mixtures of any product of heading 4001 with any product of this heading, in primary forms or in plates, sheets or strip.
9999	Other (<i>Any polymer not covered by the other headings</i>) + Generic information on the identity of the polymers <input type="text"/>

Appendix 2 Instructions for use and disposal (IFUD)

The following pictograms may be used free of charge by FEICA member companies:



(provided by Cosmetics Europe)

Phrase: Do not use water to rinse off the product.



(provided by CEPE)

Phrase: Do not use water to rinse off the product.

Additional suggestions for phrases where so far no pictograms are available:

- Avoid release to the environment
- Collect spillage
- Dispose waste in accordance with the local rules
- Do not pour product down the drain
- Do not wash tools with water
- Collect rinsing water and reuse as much as possible
- Let residual product cure before disposal according to local rules
- Avoid loss of powdery material, e.g. due to drifting
- Avoid mist formation and overspray as far as possible and collect if necessary
- Do not dispose of rinsing water into the environment

Depending on the product and its (intended) use, the supplier of the SPM-containing product may select the appropriate phrase(s) and/or pictogram(s).

Appendix 3 E-Calc_SPM calculation tool

attached as a separate file

Appendix 4 E-Calc_SPM concept

attached as a separate file