Response from the Netherlands to the European Commission's public survey on 'Microplastics pollution – measures to reduce impacts on the environment'

Microplastics do not belong in the environment. In addition, there are indications that microplastics can be harmful to human health and ecosystems. That is why the Netherlands embraces the Commission's ambition to reduce emissions of microplastics in the environment by 30% in 2030. The Netherlands would like the Commission to elaborate on how the reduction target of 30% is set and in what way the Commission aims to monitor progress in reaching the target.

The Netherlands answered the survey based on the general wish for ambitious European measures to reduce and prevent microplastics in the environment. This additional letter explains the guiding principles in answering the survey. The Netherlands finds that some questions in the survey leave too much room for interpretation. The Netherlands therefore decided to leave these questions unanswered in the survey, and instead include the Dutch position on these questions in this additional letter.

Data and knowledge – towards European monitoring, supervision, and enforcement

Scientifical knowledge about microplastics is constantly progressing. It is clear that microplastics end up in the environment and are also detected in the human body. They don't belong there. More research is needed to determine the precise effects of microplastics on humans and ecosystems. (question 1)

It's important to have uniform methods in place for measuring the amount of microplastics in the environment and for determining from what sources the microplastics come from. Harmonization is needed for EU monitoring mechanisms and for supervision and enforcement mechanisms.

The Netherlands also underlines the need for sufficient flexibility within the European microplastics policy package in order to link up with the latest scientifical knowledge on microplastics. The Netherlands currently identifies the following topics for further European research:

1. the sources of microplastics and the routes they take before they reach the environment or the human body;
2. the effects of microplastics on human and ecosystem health;
3. the speed at which different types of plastics break down into harmless compounds;
4. which microplastics and associated properties are the most harmful;
5. to what extent there are economic consequences of pollution by microplastics.

Voluntary measures are not enough – towards European laws and regulations

Regardless of the current knowledge and data gaps, the Netherlands fully supports the Commission's call for precautionary measures to prevent and reduce microplastics in the environment. The Netherlands takes measures at a national level against microplastic pollution. For example, The Netherlands recently implemented measures to reduce plastic litter as an important source of microplastics. However, pollution by microplastics does not stop at the border. The Netherlands is therefore in favor of ambitious European cooperation to reduce microplastics, and where possible the Netherlands also strives for a global approach.

The Netherlands notes that voluntary measures are important, but are not always sufficiently effective. Therefore The Netherlands calls for additional policy measures. The Netherlands supports ambitious European legislation and regulations to reduce and prevent microplastics close to the source. The Netherlands prioritizes uniform European measuring methods for environmental

pollution by microplastics as a necessary step towards harmonized European monitoring and standardization. Where monitoring, regulations and standards are still under development, voluntary cooperation remains essential for reducing and preventing environmental pollution by microplastics. Therefore, it's important that all partners in the (micro)plastic chain take action against environmental pollution by microplastics. (question 2)

Prevention is better than cure – towards a European source approach

The Netherlands calls the Commission to focus on the entire life lifecycle of plastics in reducing microplastic pollution. The Netherlands is a strong advocate of policy measures early in the lifecycle, because that is where the effect is most significant.

The Commission's approach focuses on sources that are known to release the most microplastics into the environment. The Netherlands broadly embraces the source-based approach. The Netherlands does, however, question the Commission's choice to include geotextiles and detergent capsules for laundry and dishwashers as main sources of microplastics in this survey. Further research is needed to determine to what extent geotextiles and detergent capsules for laundry and dishwashers are main sources of microplastics and which measures could prove effective for reducing and preventing microplastics from these sources.

In general, The Netherlands also calls on the Commission to always look out for any unintended negative effects of measures to reduce and prevent microplastics pollution. For example, discouraging materials which may add to microplastics pollution must not lead to alternatives that entail a greater environmental impact. In addition, research is needed into innovations that can contribute to the capture of microplastics.

Dutch position - source by source

With regard to pellets, the Netherlands is a strong advocate for an independent international certification system for pellets with criteria that are in line with the recommendation already established in the OSPAR partnership.[1] Current voluntary measures such as Operation Clean Sweep are of great importance in reducing plastic pollution. However, they have not yet affected sufficient result. An independent international pellet certification system is thus needed. (question 4-6)

Improving tyre pressure is important in tackling microplastics pollution from tyre abrasion. Low tyre pressure is a major cause of tyre abrasion and the subsequent microplastics emissions into the environment. The Netherlands would therefore like to see more attention for measures to improve tyre pressure in the Commission's proposal. The Netherlands has reservations concerning the Commission's suggestions for reducing microplastics by implementing EU measures that affect road infrastructure and maintenance. On a European level, The Netherlands prefers measures closer to the source, for instance by including tyre abrasion as a criterion to the EU tyre label. (question 7)

The Netherlands is a strong advocate of the reduction of microplastics from textiles in, for example, in the EU strategy for sustainable and circular textiles. The Netherlands asked the Commission to include a mandatory sustainability label, the phasing out of substances of concern, and the minimization of pollution of textiles due to the release of microplastics.[2] It's important that the reduction of microplastics in textiles takes place as early as possible in the chain. Measures at the end of the chain can be effective, such as measures aimed at consumer behavior, mandatory labels,

[1] OSPAR - Convention for the Protection of the Marine Environment of the North-East Atlantic
[2] https://www.permanentrepresentations.nl/documents/publications/2021/10/6/reach-up-joint-paper-on-textiles

or increased responsibility of producers. However, the largest effect is achieved earlier in the chain, for instance in the design phase.[3] The Netherlands is therefore pleased that the EU strategy for sustainable and circular textiles has announced sustainability requirements for textiles, after the adoption of the Ecodesign for Sustainable Products Regulation (ESPR), and strongly urges the Commission to explicitly include microplastics. In the Netherlands, filter systems in wastewater treatment is very effective. Filter systems in washing machines can also contribute by preventing microplastics from textiles entering the environment at an earlier stage, before reaching wastewater treatment plants. (question 8-9)

Paint is one of the main sources of environmental pollution from microplastics. In the Commission's previous call for evidence on microplastics, The Netherlands urged the Commission to include microplastics from paint in addition to microplastics from car tyres, textiles, and pellets. The Netherlands is therefore pleased that the Commission included paint as an important source of microplastics in the present survey. (question 17) Microplastics are released especially in the maintenance phase of painted materials. The Netherlands advocates for measures aimed at extending the life of paint. More knowledge is needed about possible applications of plastic-free paint and other alternatives that could reduce microplastics from paint. Based on this, measures can be explored, for example through the Ecodesign for Sustainable Products Regulation (ESPR). (question 10-11)

More research is needed to determine to what extent geotextiles are a main source of environmental pollution by microplastics. The Netherlands cannot support measures to prevent microplastics from geotextiles without a solid scientific knowledge base to support this. In the Netherlands, geotextiles are used as a bank protection structure in river maintenance. With a lifespan of 50-100 years, geotextiles are considered to be the most sustainable solution for bank protection structures. In addition, NL argues look closely into the (financial) consequences for the implementation of possible measures when considering regulations in this area. (question 12-13)

With regard to reducing and preventing microplastic pollution from washing capsules, more knowledge is needed about the biodegradability of the materials used. The Netherlands wants washing capsules to be designed with biodegradable plastics that can be degraded under realistic environmental conditions. Other measures later in the chain, such as consumer awareness, can also contribute to reducing microplastics from washing capsules. (question 14-15)

Connecting the dots – towards a holistic European policy package

It's important that the policy package 'Microplastics pollution – measures to reduce impacts on the environment' is aligned with other European policy initiatives.

The Netherlands is looking forward to the anticipated restriction under the REACH directive to prevent microplastic pollution. The Netherlands urges the Commission to take ambitious and effective measures to reduce and/or prohibit intentionally added microplastics to products in line with the urgency and seriousness of the environmental pollution caused by these intentionally added microplastics.

The Netherlands believes that the implementation of the Single Use Plastics Directive is an important step to reduce microplastic pollution from plastic litter as one of the main sources of microplastics.

[3] https://www.eea.europa.eu/publications/microplastics-from-textiles-towards-a-circular-economy-for-textiles-in-Europe

In addition to these policy initiatives which are already mentioned by the Commission in the public survey, the Netherlands would like to see a holistic approach to tackle microplastic pollution. Measures should be in place throughout other related European policy initiatives, for example the Ecodesign for Sustainable Products Regulation (ESPR) and policies against substances hazardous to human health.[4]

[4] COM (2022) 142