



Marinalg Comments on European Chemicals Agency (ECHA) Public Consultation on the Restriction Dossier for Microplastics Intentionally Added to Products

(submitted 20 September 2019)

General Comments (Scope or restriction option analysis)

Marinalg International is a global association representing producers of seaweed-derived hydrocolloids industry, including carrageenan, processed Eucheuma seaweed (PES), alginates and agar. These additives are widely used in food, pharmaceutical and other industries. When used in food, including in food supplements supplied in a solid form¹, carrageenan and other hydrocolloids are considered food additives as described in Regulation (EU) No 231/2012 laying down specifications for food additives listed in Annexes II and III to Regulation (EC) No 1333/2008².

Marinalg members have noted that, the proposed ECHA restriction dossier for microplastics intentionally added to products:

- Polymers “shall not, from [entry into force (EIF)], be placed on the market as a substance on its own or in a mixture as a microplastic in a concentration equal to or greater than [0.01]% w:w” (Table 3 – paragraph 1);
- “‘Microplastic’ means a material consisting ‘of solid polymer containing particles, to which additives or other substances may have been added, and where $\geq 1\%$ w/w of particles have (i) all dimensions $1\text{nm} \leq x \leq 5\text{mm}$, or (ii), for fibres, a length of $3\text{nm} \leq x \leq 15\text{mm}$ and length to diameter ratio of >3 ” (Table 3 – Paragraph 2a);
- “Paragraph 2a and 2b shall not apply to (...) polymers that are (bio)degradable, as set out in Appendix X” (Table 3 – Paragraph 3b).

Whereas the current definition of microplastics in the ECHA consultation could potentially cover certain food grade polymers, Marinalg would like to stress that carrageenan and other hydrocolloids have been demonstrated to be readily biodegradable by the application of recognised OECD screening methods. Therefore, in our view, the ready biodegradability clearly excludes carrageenan and other hydrocolloids from the microplastics definition.

Specific Comments (Information Request #1)

After a careful review of the “Criteria for demonstrating the (bio)degradation of microplastics” according to Paragraph 3b (APPENDIX X), we noted that the sub-sections dedicated to “Ready biodegradation” and “Enhanced/modified ready biodegradation” refer to the OECD TG 301 B, C, D, F and OECD TG 310 test methods. Marinalg members have used the OECD TG 301B method to demonstrate the biodegradability of carrageenan and thus confirm that this test was applicable for the definition and analysis of their

¹ See [COMMISSION REGULATION \(EU\) 2018/1497 of 8 October 2018 amending Annex II to Regulation \(EC\) No 1333/2008 of the European Parliament and of the Council as regards food category 17 and the use of food additives in food supplements](#) for the restrictions of use applicable to food supplements.

² See <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02012R0231-20181025>.

biodegradability. The pass level for OECD 301 B of at least 60 % within 10 days is met and after 28 days the biodegradation is 97 % for carrageenan.

More relevant details and data to substantiate this statement are not being submitted presently due to confidentiality reasons but are available upon request.