

Opening Statement to the Oireachtas Joint Committee on Joint Committee Housing, Planning and Local Government.
February 12th, 2019

Siobhán Dean Director of ICDA

I wish to thank the Joint Committee for the opportunity to consult on the Prohibition of Certain Products containing Plastic Microbeads Bill 2018. ICDA is the Ibec group representing Irish companies engaged in the manufacture, distribution or sale of cosmetics, toiletries, detergents and allied household products. The cosmetics and detergent sector take the issue of plastic aquatic litter seriously and share the overarching goals of the Irish government and indeed European Union to address this challenge. I am joined today by John Chave, Director General of Cosmetics Europe. Cosmetic Europe is the European Trade association representing over 4,500 companies and national associations in the Cosmetics and Personal care sector in Europe.

The cosmetic and detergent sector is an industry that has taken positive action on the occurrence of Plastic Microbeads in the Marine environment. Building on voluntary initiatives taken by its individual members companies, on 21 October 2015, Cosmetics Europe^[1] issued a recommendation to its members stating: ***“In view of the public concerns expressed over plastic debris in the marine environment, and given the availability of alternative materials, Cosmetics Europe recommends its membership to discontinue, in wash-off^[2] cosmetic products placed on the market as of 2020: the use of synthetic, solid plastic particles used for exfoliating and cleansing that are non-biodegradable in the marine environment (microbeads³).*”**

Results of **2018 data** collected by Cosmetics Europe show that between 2012 – 2017 the European cosmetics industry phased out as much as **97.6 %** of plastic microbeads used for exfoliating and cleansing purposes in rinse-off cosmetics and personal care products. The European industry is on track to achieve 100% phase-out of plastic microbeads by 2020.

Our voluntary action was taken despite it being widely acknowledged that the cosmetics sector is a minor potential contributor; studies estimate a potential contribution of between 0.1%-2%⁴, of the total aquatic plastic litter. This potential minor contribution is ever decreasing as progress is made towards completion of the phase-out of plastic microbeads. In fact, by far the largest potential contributors to microplastic marine litter are from the breakdown of bigger plastics, for example car tyres, plastic pellets and microfibres from clothes.⁵

Similarly, to personal care products, the use of microbeads in home care products is very limited and is further decreasing as several companies have already announced their intention to

1]Cosmetics Europe is the European trade association for the cosmetics and personal care industry. Directly, or through national membership, Cosmetics Europe represents over 5,500 innovative companies. As well as multinational companies, there is a large majority of Small and Medium Enterprises (SMEs) of cosmetics products manufacturers in our sector

[2] A wash off product is a rinse off cosmetic product intended to be removed with water after a short time period after use” Rinse-off products are the following type of products: Shampoos, Hair conditioners, Shower Gels, Soap Bars, Toothpastes, Shaving foams, Scrub and exfoliating products.

[3]. Microplastic particles: Water insoluble solid plastic particles with a size less than 5mm that can be found as aquatic litter, where plastic is understood as synthetic water insoluble polymers that can be moulded, extruded or physically manipulated into various solid forms which retain their defined shapes in their intended applications (i.e. use and disposal)

Plastic microbead: Any intentionally added, 5 mm or less, water insoluble, solid plastic particle used to exfoliate or cleanse in rinse-off personal care products

[4] Gouin et al, 2015, “Use of Micro-Plastic Beads in Cosmetic Products in Europe and Their Estimated Emission to the North Sea Environment” found that in 2012 4360 tons were used.

[5]Primary microplastics in the oceans: a global evaluation of sources, IUCN Report, 2017

* For more information please go to: www.cosmeticseurope.eu/news-events/reduction-use-plastic-microbeads

reformulate their product in a more environmentally friendly way (AISE found a decrease of 54% in the use of microbeads from 2016 to 2018).

In the 2016 European Commission «*Study to support the development of measures to combat a range of marine litter sources*» detergents and maintenance products were not identified as key contributors to marine Plastic litter. This sector traditionally makes very limited use of materials that could qualify as microplastics. But in the acknowledgment of the potential marine litter stemming from secondary microplastics during the washing of synthetic textiles. The detergent sector through the European Trade association A.I.S.E is actively engaged in a “Cross-Industry Agreement”, with European industry associations representing the global value supply chain of garments and their maintenance. This Agreement – referred to in the European Commission Strategy for Plastics – supports the need for further investigation and a better understanding for the prevention of microplastic (synthetic textile microplastic fibres) release into the aquatic environment during the washing cycle. It also aims to find feasible solutions based on science and research, which can effectively be applied by industry, consumers, and authorities.

To conclude, we believe that voluntary actions taken by industry is proving extremely effective at removing plastic microbeads from products. Any proposed ban of microbeads in detergents and rinse-off personal care products must be supported by clear definitions to operate effectively. The proposed microbead definition in the general scheme is too broad and as a result would prevent Irish manufacturers manufacturing rinse off cosmetics and detergents products that otherwise would be permitted in other EU countries. It would also remove many products on the Irish market until the products are reformulated. The business and consumer impacts in the general scheme does not take this into accounts. Pending the outcomes of the ECHA REACH restriction process it is essential for the smooth functioning of the European Single Market, not to create regulatory barriers to trade and we would encourage the scope of any regulatory measures proposed aligns with already existing national member state legislation such as in the UK- England, Scotland, Wales and pending Northern Ireland, to avoid disadvantaging the Irish manufacturing industry.