WONIPA Guidance Note

THE IMPACT OF EU MICROPLASTICS RESTRICTIONS ON INDUSTRIAL NITROCELLULOSE.

Regulation (EU) 2023/2055 amending the REACH regulation with regard to synthetic polymer microparticles was published on 25 September 2023.

DEFINITION OF SYNTHETIC POLYMER MICROPARTICLES

This regulation defines synthetic polymer microparticles as

Polymers that are solid and which fulfil both of the following conditions:

- are contained in particles and constitute at least 1 % by weight of those particles; or build a continuous surface coating on particles.
- at least 1 % by weight of the particles referred to in point (a) fulfil either of the following conditions:
    - all dimensions of the particles are equal to or less than 5 mm.
    - the length of the particles is equal to or less than 15 mm and their length to diameter ratio is greater than 3.

This definition is very wide ranging and as a result industrial nitrocellulose falls within the definition of a synthetic polymer microparticle.

However, the regulation also lists a number of exemptions for certain types of synthetic polymer microparticles. The following exemptions specifically apply to industrial nitrocellulose.

EXEMPTIONS

The restrictions listed in Annex XVII to Regulation (EC) No 1907/2006 as amended by (EU) 2023/2055 do not apply to the placing on the market of:

- synthetic polymer microparticles, as substances on their own or in mixtures, for use at industrial sites.
- synthetic polymer microparticles the physical properties of which are permanently modified during intended end use in such a way that the polymer no longer falls within the scope of this entry.

CONCLUSION

While industrial nitrocellulose does meet the general definition of a synthetic polymer microparticle, it is not subject to any of the restrictions listed in (EU) 2023/2055 due to the fact that it is not supplied direct to the general public and when used it is physically modified.

It is only supplied for use at industrial sites and when used at these sites it is dissolved in solvent meaning that its physical properties are permanently modified so that it no longer meets the definition of a synthetic polymer microparticle.

Disclaimer: This guidance note states the opinions of WONIPA, however it remains the responsibility of each individual user of industrial nitrocellulose to confirm that their method of use and final product formulation meet the requirements of the exemptions quoted in the note.

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