



Council of the European Union  
General Secretariat

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**Interinstitutional files:  
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**WK 10413/2024 ADD 5**

REDACTED DOCUMENT ACCESSIBLE TO THE PUBLIC  
(22.01.2026)

**LIMITE**

ONLY MARGINAL PERSONAL DATA HAVE BEEN  
REDACTED

**ENV**

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## **CONTRIBUTION**

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From: General Secretariat of the Council  
To: Working Party on the Environment

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N° prev. doc.: ST 12265/24; WK 10180/2024  
N° Cion doc.: ST 14248/23 + ADD 1

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Subject: Plastic Pellets Regulation: Follow-up to the WPE on 23 July 2024 - comments from a delegation

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Delegations will find attached comments received on the follow-up to the WPE on 23 July 2024 call for comments from the PL delegation.

Also note that the DK comments published in WK 10413/24 ADD 1 and ADD 4 are identical and were re-published by mistake.

## POLAND

### Proposal for a Regulation of the European Parliament and the Council on preventing plastic pellet losses to reduce microplastic pollution – call for comments

#### Recitals:

##### Recital (24)

~~Medium and large sized~~ Economic operators that are not micro enterprises that operate installations where plastic pellets are handled in quantities above 1 000 tonnes may bring higher risks of pellet losses to the environment. For this reason, these enterprises should be required to implement, for each installation, extra actions like carrying out an annual internal assessment, and adopting a training programme addressing specific training needs and modalities. ~~The internal assessment may among others cover the following subjects: the estimated quantities and causes of losses; the preventive, containment and clean up equipment and/or procedures implemented to avoid future losses, and their effectiveness; discussions with the personnel, inspections of equipment and procedures in place and revision of any relevant documentation.~~ In addition, for these enterprises, compliance with the requirements laid down in this Regulation should be demonstrated by obtaining, and renewing, a certificate issued by certifiers. ~~The certifier, in particular consultancy services, shall not engage in any activity that may conflict with their independence of judgement, or integrity in relation to the certification activities for which they are accredited.~~ These certifiers can either be an accredited conformity assessment body, or an environmental verifier licenced to carry out verification and validation in accordance with Regulation (EC) No 1221/2009 of the European Parliament and of the Council<sup>15</sup> on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS), or an environmental verifier licenced to carry out verification and validation of another environmental management system (EMS). The certificate should correspond to a unique format in order to ensure homogeneous information.

**Commented** [REDACTED] PL prefers to retain the original provision in Recital 24, not extending the scope of the obligations to small enterprises.

#### Articles:

##### Article 2

###### Definitions

For the purposes of this Regulation, the following definitions apply:

- (a) 'plastic pellet' means ~~a small mass~~ of preformed polymer-containing moulding material, having relatively uniform dimensions in a given lot, that is used as feedstock in plastic product manufacturing operations;

**Commented** [REDACTED] We kindly ask you to clarify the term of „a small mass of“. The imprecise definition, in our opinion, does not fulfil its function and creates opportunities for different interpretations of plastic pellets that could be considered as microplastics.

##### Article 4

###### Obligations regarding the handling of plastic pellets

~~2~~ Economic operators that are ~~medium and large sized enterprises~~ operating installations where plastic pellets in quantities below 1 000 tonnes have been handled in the previous calendar year or that are micro ~~or small sized~~ enterprises shall notify an update of the risk assessment plan for each installation as well as a renewal of the self-declaration of conformity to the competent authority every 5 years from the last notification.

Clarifying the definition of "plastic pellets" by specifying measurable values e.g. in terms of weight or size will allow a clear distinction between "plastic pellets" and "microplastics".

**Commented** [REDACTED] PL prefers to retain the original provision in Article 4, not extending the scope of the obligations to small enterprises.