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# 1. Our Position

## Our Understanding of Microplastics

Globally, there is currently no uniform definition of what exactly falls under the term microplastics. As a rule, this means a solid plastic that is smaller than five millimeters, for which the term “microbeads” is often used.

However, under Irish legislation<sup>1</sup>, a microbead is defined as a solid plastic particle that is:

1. not water soluble
2. not more than 5 millimetres at its widest point
3. not less than one nanometre at its narrowest point

Plastic is defined as a synthetic polymer that:

- can be moulded, extruded or physically manipulated into different shapes
- retains its final manufactured shape when used for the purpose for which it was manufactured

A distinction can also be made between primary and secondary microplastics. Primary microplastics are industrially manufactured plastic particles that are intentionally added to a product. This includes, for example, microplastics, which are used as an abrasive in a peeling product. Secondary microplastics, on the other hand, only arise when plastics naturally decay. For example, through tyre wear or plastic waste such as packaging, bags or bottles, which break down into smaller and smaller plastic parts.

Lidl takes responsibility for the product areas in which Lidl has a direct influence on.

## Environmental Impact

Plastic is a controversial material that poses an ever-increasing environmental problem, as plastic is often non-biodegradable and therefore remains in the environment for many years. It is mostly produced using the increasingly scarce raw material crude oil. Oil production causes considerable ecological issues through contamination of the soil and water, air pollution, fragmentation of habitats or deforestation. There are also social challenges such as displacement or diseases caused by soil and water pollution.

In addition to the risks associated with the production of microplastics, there are also problems with their entry into the environment. Primary microplastics, such as those used in shower gels, mostly find their way into sewage treatment plants via wastewater. It has not yet been adequately researched whether the sewage treatment plants sufficiently filter microplastic particles from the wastewater. In this way, unfiltered microplastics can get into the sea and groundwater via bodies of water. In terms of quantity, however, the most important source of microplastics in the sea is the decomposition of larger plastic parts into secondary microplastics.

In the sea, microparticles made of plastic, as well as larger plastic parts can lead to damage to the digestive tract of marine animals, hinder digestion and block food intake. In addition, microplastics can act as a means of transport on which pollutants, invasive species and pathogens accumulate. In addition, chemicals that are suspected of damaging health, such as plasticizers, which are used as additives in the manufacturing process of plastic, can escape into the water or into the digestive systems of marine organisms. The exact effects are the subject of current research.

Microplastics can also get into the environment through sewage sludge from sewage treatment plants, which is often applied to fields as a nutrient-rich fertilizer. There the particles can be ingested by animals or washed out into water. The remains of plastic that has been thrown away can even be found in the air.

Microplastics are found in water, on land and in the air and also find their way into our food via the food chain. It has already been found in many foods (e.g. mussels, fish, honey, beer) and in drinking water. The exact human toxicological dangers that arise from the entry of plastics or plastic particles are currently the subject of various scientific studies.

## Our Approach

On 20 February 2020, the Microbeads (Prohibition) Act 2019<sup>1</sup> came into effect in Ireland. This Act prohibits the manufacture or placing on the market of cosmetic and cleaning products that are water soluble and contain microbeads as per the Irish legislated definition. At Lidl Ireland we are already fully compliant with the Act.

At an international level though, as part of the Schwarz Group which includes Lidl and Kaufland retail divisions, Lidl is also committed to avoiding microplastics in all our own-brand cosmetics that we sell across the Group, as shown below. The Schwarz Group is aware of its responsibility for the environment. With REset Plastic, Schwarz has developed a holistic, international strategy that is divided into five fields of action: Avoidance, design, recycling, disposal, and innovation and education. Microplastics are part of the social debate about plastic. We have been working intensively on the topic since 2015 and are of the opinion that reducing microplastic emissions from every source is important. So far there is no legal ban on microplastics in cosmetic products at European level. We therefore favor a uniform European legal framework in which a clear definition of microplastics is made.

Therefore by the end of 2021, together with our suppliers of cosmetic products we will have introduced the following targets:

**Avoid the use of microplastics in the formulations of our own-brand cosmetics products by 2021. Provided that the renunciation of synthetic polymers does not result in any significant restriction in product performance and / or safety.**

These are plastic particles with an abrasive effect (“microbeads”) that are smaller than five millimeters. We are currently considering the plastics polyamide (PA), polyethylene (PE), polyethylene terephthalate (PET), polyester (PES), polyimide (PI), polypropylene (PP), polyurethane (PUR). When we speak of “formulation without microplastics”, we include other, non-biodegradable, synthetic polymers \* that are solid, dispersed, gel-like, dissolved or liquid in our definition. These include among other things polyacrylates (e.g. acrylate copolymers, acrylate crosspolymers, polyacrylates, carbomer, polymethyl methacrylate, polyacrylamides), polyquaternium, polystyrene, silicones (e.g. methicone, dimethiconol, other siloxanes and silanes), PEG > 35, PPG > 50, Polyvinyls (eg polyvinylpyrrolidone (PVP)), polylactic acid (PLA), ethylene-vinyl acetate copolymers.

\*Synthetic polymers are linked from monomeric basic building blocks through chemical reactions to form polymeric macromolecules. This should be distinguished from semi-synthetic polymers that are based on natural polymers such as cellulose and are chemically modified.

## 2. Scope

This position paper relates to all Lidl Ireland own brands in the field of cosmetics, personal care and cleaning products.

## 3. Our Actions

At a Schwarz Group level, at the moment of this publication, solid microplastics based on polyethylene (PE), polypropylene (PP), polyethylene terephthalate (PET), polyvinyl chloride (PVC), polyamide (PA), polystyrene (PS) and polyurethane (PU) have been removed from Lidl cosmetic products. For example, solid microplastics based on polyethylene (PE) and polypropylene (PP) have been replaced by pumice stone particles (perlite) in shower peelings or by bamboo particles (Bambusa Arundinacea Stem Powder) in wash peelings.

We are now taking things a step further. In close cooperation with our suppliers, we endeavour to find a suitable replacement for the so-called other synthetic polymers. These include, for example, polymethyl methacrylate (PMMA) and polytetrafluoroethylene (PTFE), which are still contained in recipes such as texturing substances, and styrene / acrylates copolymers, which are used in numerous products as opacifiers. However, alternative substances must first be analysed and evaluated for various complex factors such as safety, environmental compatibility, effectiveness and technological applicability.

Lidl's suppliers are contractually obliged to adhere to the requirements for microplastics.

Lidl Ireland informs customers about progress and news on the topic of microplastics via sustainability publications such as the *sustainability report* or via the company website.

## 4. Sources

<sup>1</sup> Microbeads (Prohibition) Act 2019

Available at: <http://www.irishstatutebook.ie/eli/2019/act/52/enacted/en/pdf>