

views on the
**Proposed Annex XV REACH Restriction –
rubber granules used in synthetic turf infill**

Meeting with DG ENV and DG GROW
15/04/2021

ETRMA, EuRIC and ESTC represent whole value chain of ELT delivered rubber granules used as infill material in synthetic turf

ESTC	The European Synthetic Turf Council, a non-profit trade association representing European, Middle East and African based companies manufacturing synthetic turf surfaces and the components used to form the surfaces and also companies that install and maintain synthetic turf surfaces. Members also include sports federations that use synthetic turf surfaces. At present ESTC has over 80 members
ETRMA	The European Tyre & Rubber Manufacturers Association (ETRMA) and its members count around 4.300 companies in the EU employing directly 360.000 people. ETRMA tyre corporate companies represent globally 59 % of world sales and 7 out of 10 world leaders are our Member. Tyre industry has a strong manufacturing presence in the EU and candidate countries with 93 tyre-producing plants and 17 R&D centres. At the end-of-life, tyres are collected and their treatment (through material recycling and energy recovery) is organized, through the ELT Management Companies across EU countries, the majority of these operating under EPR at the initiative of ETRMA members
EuRIC	The European Recycling Industries Confederation (EuRIC) through its various branches covers the vast majority of waste streams (metals, paper, plastics, WEEE, ELVs, tyres, textiles, glass and beyond), brings together National Recycling / Resource Management Federations and Companies in lieu from more than 23 European countries active locally and globally. Its members count more than 5,500 companies including large companies and SMEs, involved in the recycling and trade of various resource streams; generating 300,000 local jobs and million tons of waste recycled per year.

Synthetic turf sports fields benefit to society

- Provide **safe, durable** playing areas
- Can sustain **high levels of use** 7 days a week, 52 weeks a year - 1 synthetic turf field can easily accommodate the use of 4 – 6 natural turf fields
- Ability to sustain high use allows large parts of **society** to participate in sport every week, providing communities with the **full benefits** of playing sport, including **health, social inclusion**
- Can be used in **all weather conditions**
- Are **easier and cheaper to maintain** than natural grass fields



More than **30,000** synthetic turf full size fields across Europe

30 people / hour for
1,950 hours per year

Society benefits from **1.75 billion**
playing hours of fun and exercise
per year

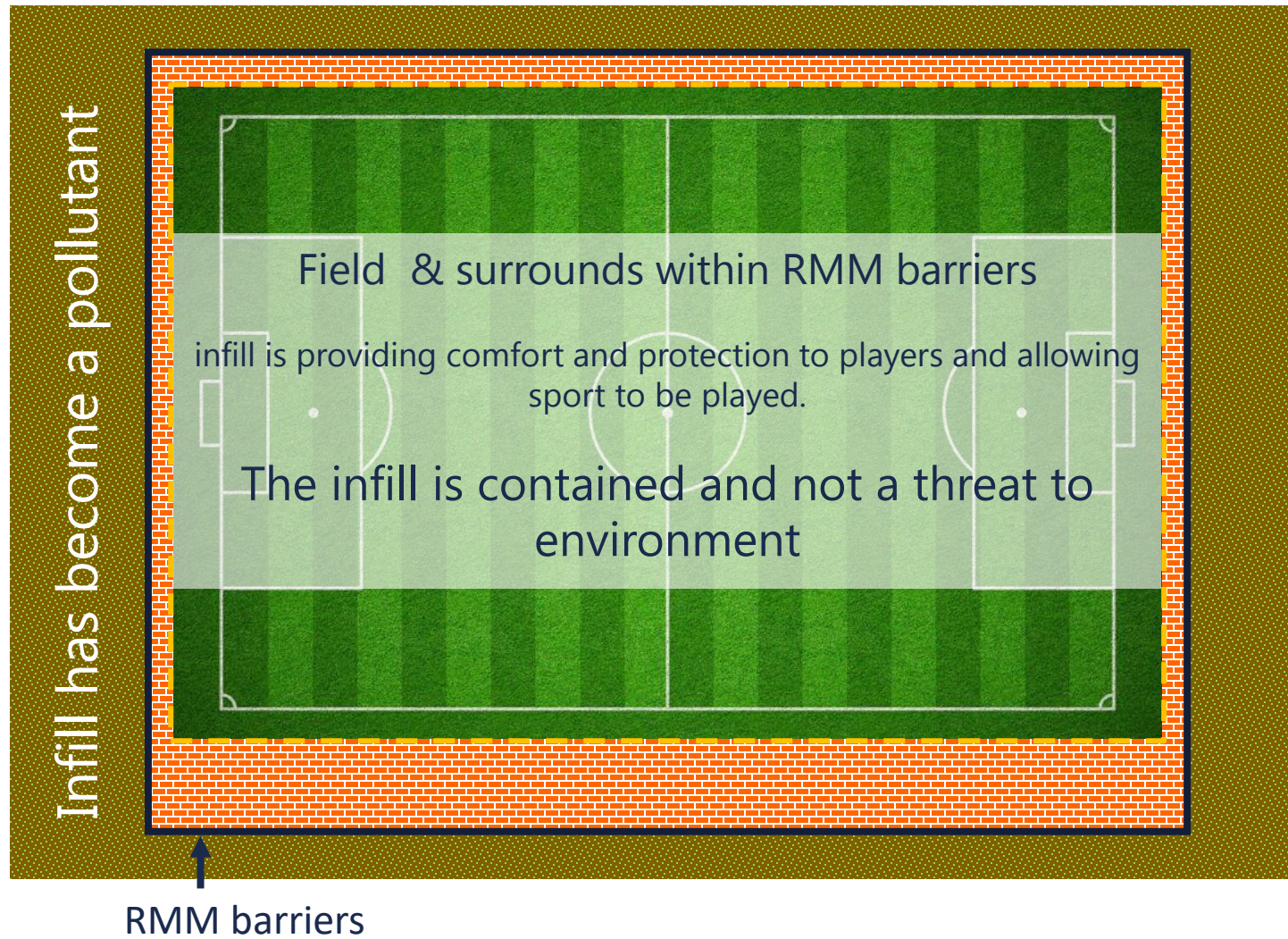


The past



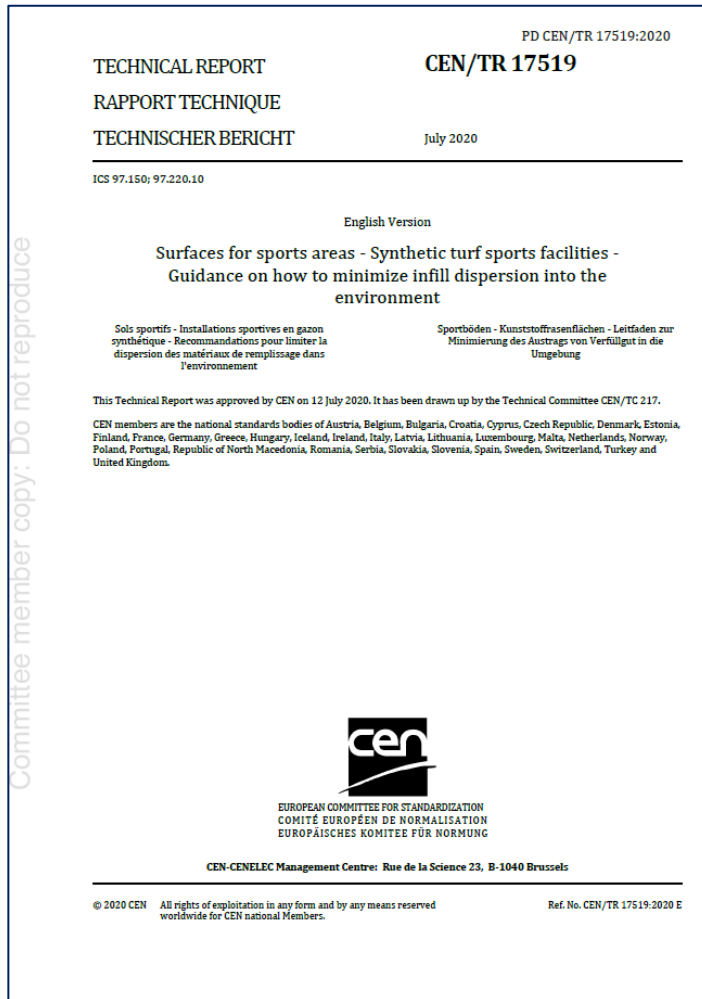
Today

- We agree that microplastic pollution needs to be minimised, wherever possible
- We agree polymeric infills meet the definition of a microplastic
- But it only becomes a pollutant if it leaves the sports field, until that point, it is key component of the sports surface
- Prevent infill from leaving the field and there is no pollution



So how do you ensure infill does not leave the sports field?

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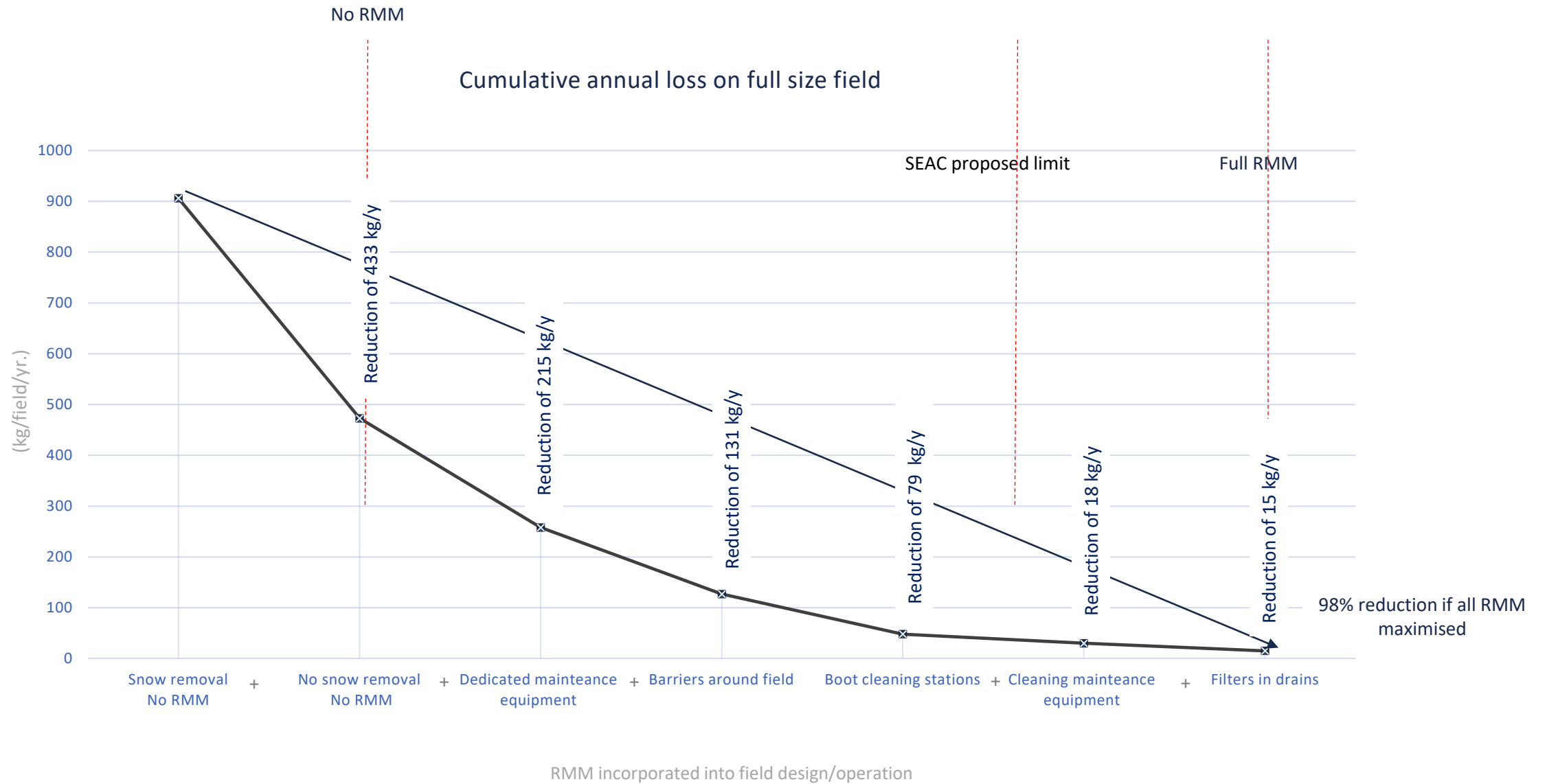


- Best practice report describing how to prevent infill from migrating from a sports field
- Prepared by the European Standards Organisation
- Published July 2020, available in all Member States
- Report's recommendations already adopted by:
 - FIFA
 - UEFA
 - World Rugby
 - Gaelic Athletics Association
 - Rugby Football League
 - International Hockey Federation
 - National sports federations

Do Risk Management Measures work ?

Data from independent report *Determining the effectiveness of Risk Management Measures to minimize infill migration from synthetic turf sports fields*, EcoLoop Aug. 2020.
Available at <https://www.estc.info/wp-content/uploads/2020/09/Ecoloop-Report-Effectiveness-RMMs.pdf>

Worst case situations	Fit snow storage areas		Fit barriers around perimeter of field		Fit filters to surface drains		Install boot cleaning stations and decontamination grates at entrances		Use dedicated maintenance equipment stored at field		Clean tractors, etc before leaving field	
Snow clearance No RMM												
Loss of 906 kg/field/year	Potential migration reduced by 433 kg/yr.	Total reduction = 48%	Potential migration reduced by 131 kg/yr.	Total reduction = 62%	Potential migration reduced by 15 kg/yr.	Total reduction = 63%	Potential migration reduced by 79 kg/yr.	Total reduction = 73%	Potential migration reduced by 215 kg/yr.	Total reduction = 96%	Potential migration reduced by 18 kg/yr.	Total reduction = 98%
Loss of 473 kg/field/year												
No RMM No Snow clearance												



SEAC reiterates that a choice for one of the options can only be taken based on policy priorities

SEAC proposes two options for polymeric infill material

- Total ban in six year's time, irrespective of social and economic costs

OR

- Mandatory use of risk management measures, with immediate effect on new fields, and all existing fields within 3 years

RAC opinion proposes a ban after 6 years



What about alternatives?



Organic infills

- More costly and requires higher maintenance
- Some need to be kept moist - increased cost
- Infill can be displaced/loss of infill during heavy rain
- Limited availability (97% of current cork production already used – not possible to increase in short or medium term)
- Rapid (bio)degradation
- Use of chemical treatments – pesticides
- Wind and water migration causing environmental contamination



Non-filled and sand dressed turf

- Increased risk of player injuries – carpet burns
- Do not satisfy FIFA, World Rugby, etc. regulations and norms
- Inconclusive player feedback – some hostile
- Increased cost
- Increased virgin material resource



Natural grass

- Limited usage capacity - less than 6 h/week
- 1 synthetic turf field = 6 natural grass fields
- Not suited to many climates
- High maintenance

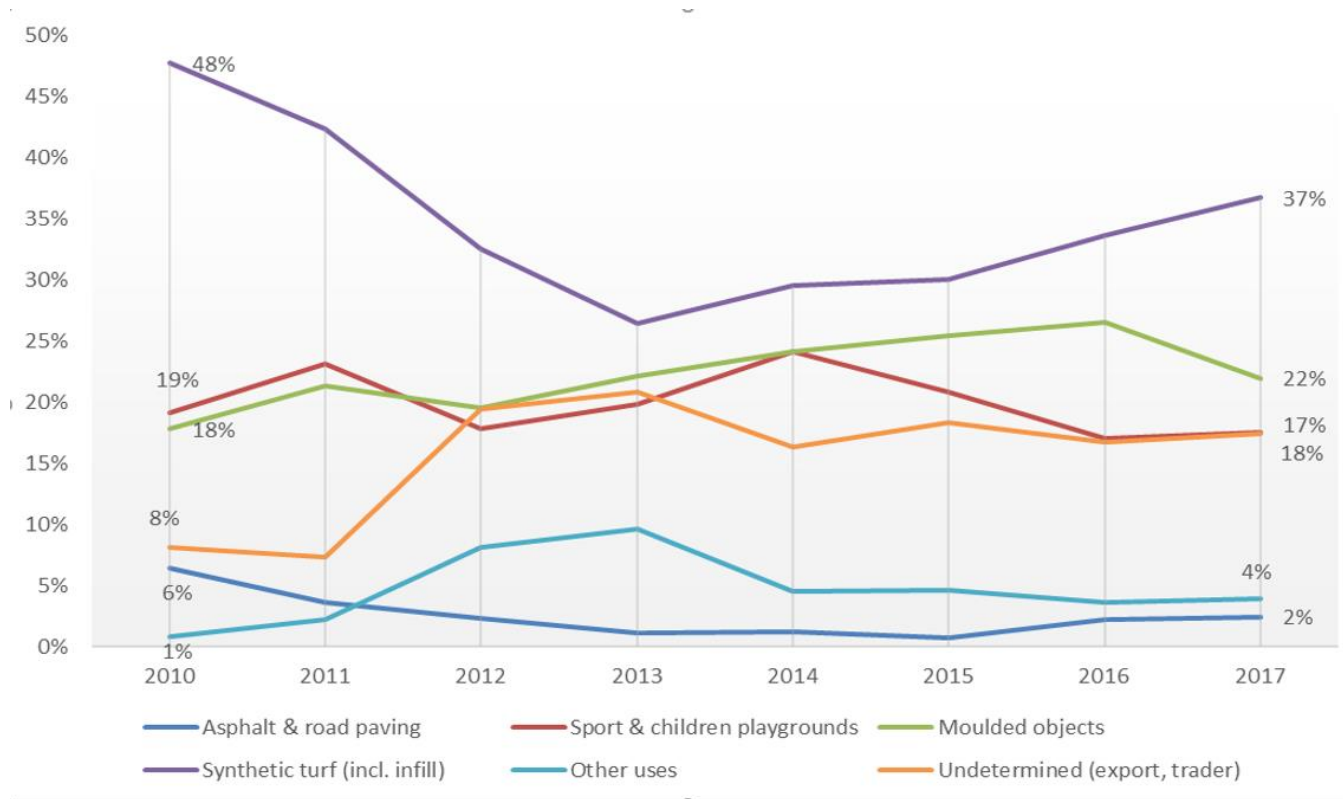
A ban will have major consequences on everyday life of sport communities

- **Reduced availability of fields** with an impact on social participation and public health
- The **cost** of synthetic turf fields **will significantly increase**
- Increased risk of **players being injured**
- Increased **operating costs** with alternate infills
- **Lack of suitable surfaces** for some climates / applications
- **Premature replacement** of existing fields if materials for on-going maintenance not available

The financial implications for fields could reach up to 800 million Euro

- UEFA now estimate over 29,000 full size fields across Europe, could be affected. Plus, a significant number of mini-fields
- Remove & dispose of existing carpet – often not possible to just change infill - meaning full replacement is required
- Installation of a shockpad (many existing field are designed to use infills that have elastic properties)
- 60,000 Euro per field to upgrade = more than 800 million Euro for all 13,600 affected full-size fields
- 200,000 Euro per field if resurfacing is required
- If relevant for 60%, this equals to more than 1.6 billion Euro for affected full-size fields

Use End-Of-Life tyres granules as infill material is essential to meet the circular economy goals

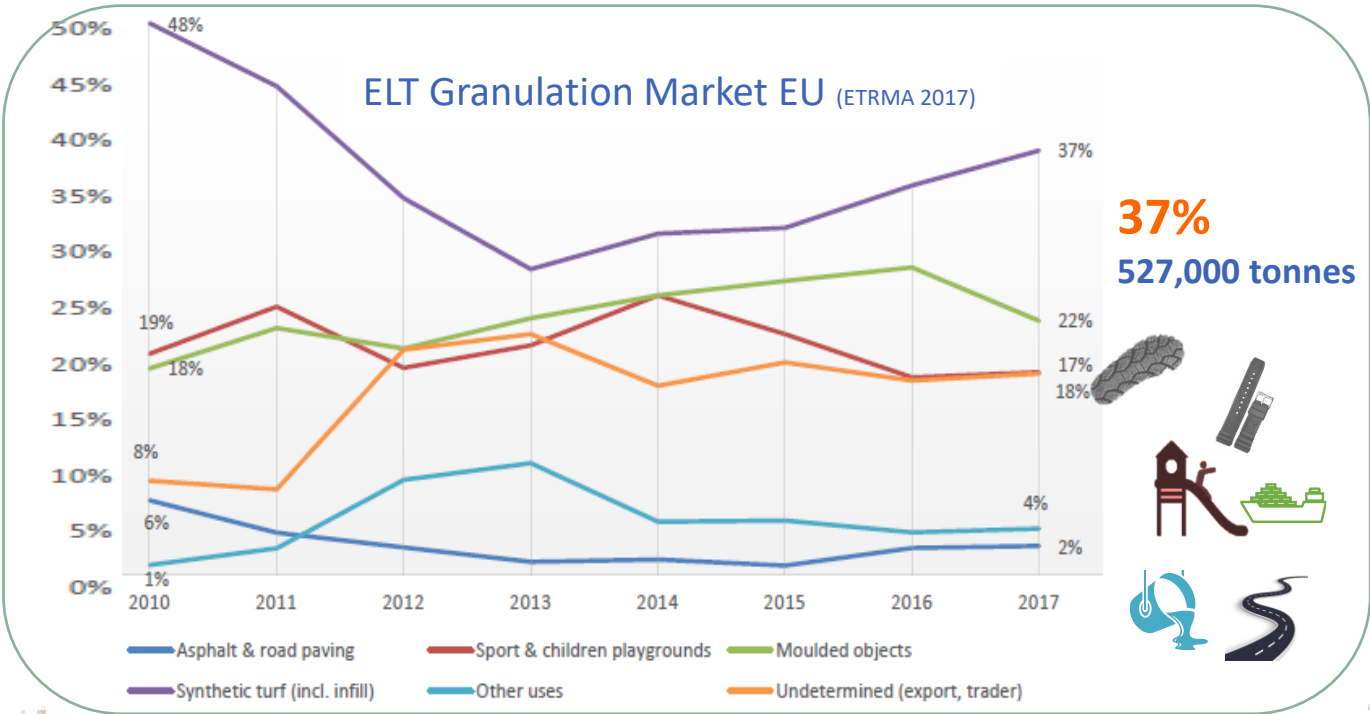


Evolution and Share of End-Of-Life derived rubber in EU from the overall 1.5 million tonnes of rubber process from Tyres, ETRMA, 2018.

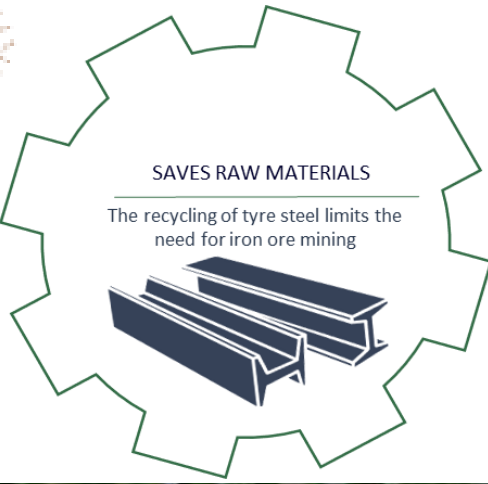
**To date there are no material recycling alternatives to compensate for the infill market loss
As a result, 527,000 tonnes of ELTs would mainly be processed for energy recovery.**



Benefits to circular economy of using ELT-derived rubber



37%
527,000 tonnes



Synthetic turf and ELT environmental benefits

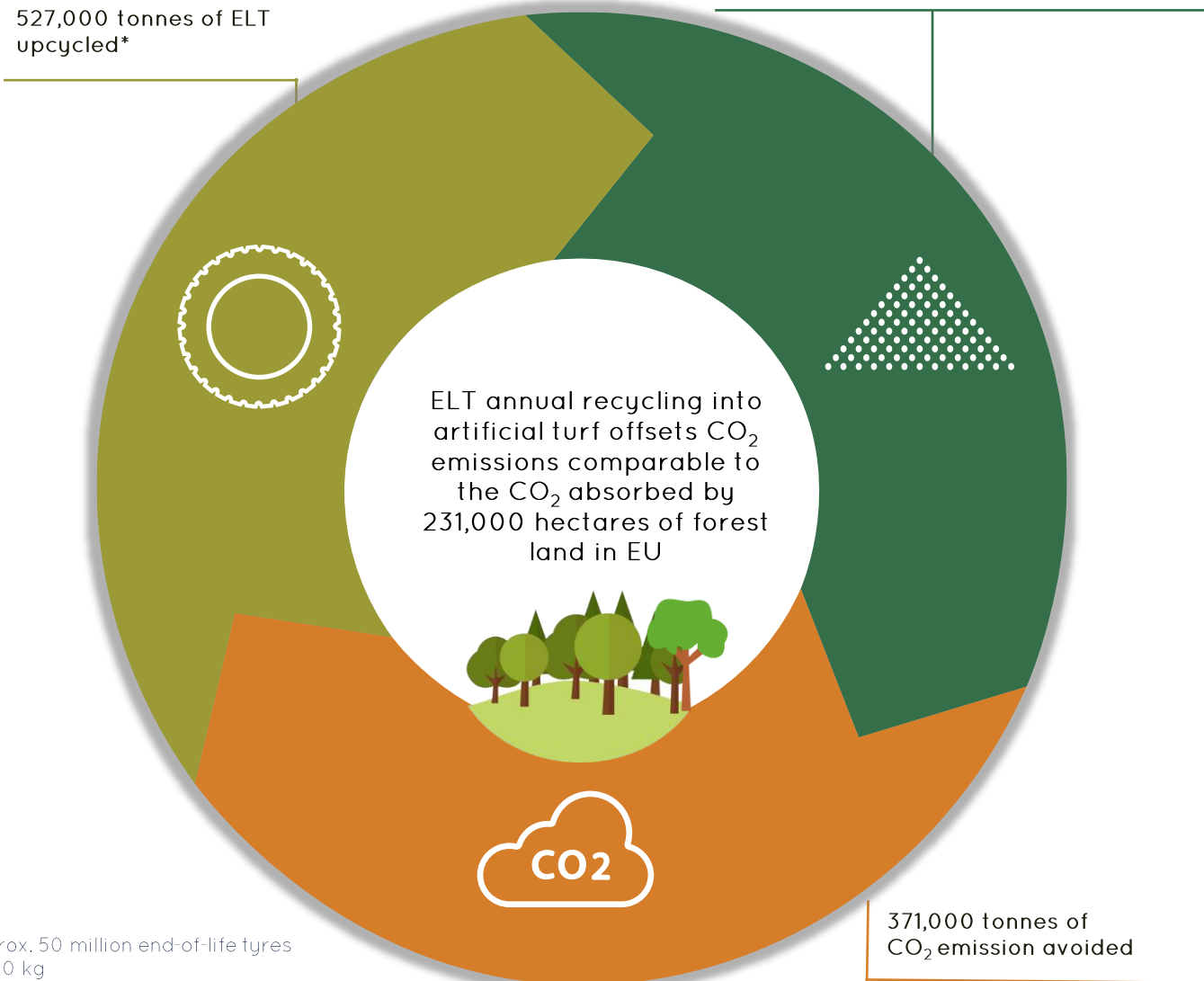
Approx. 2.6 million tonnes of ELT infill are currently installed in artificial turf pitches and **each year**:



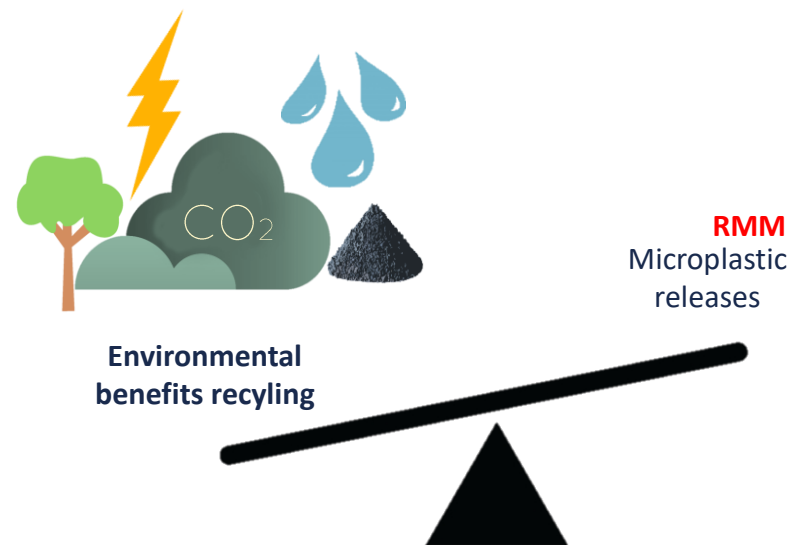
* Corresponding to approx. 50 million end-of-life tyres each weighing approx. 10 kg

527,000 tonnes of ELT upcycled*

400,000 tonnes of ELT granulate produced and used as high-performance infill in artificial turf pitches, substituting virgin rubber materials



The ban will affect ELT circularity, the environment and disturb local jobs and economies



ETRMA - EURIC - ESTC -- rubber granules used in synthetic turf infill

ESTC, ETRMA and EURIC call for

A derogation from a ban on the sale of polymeric infills to any field on which CEN TR 17519 risk management measures are implemented.

Legal responsibility for ensuring compliance should be placed on the organisation purchasing the infill for use on the field



Conclusions and takeaways

1. Microplastics release from artificial turf pitches to the environment must be reduced and it can be **efficiently avoided**, in both terms of technical implementation and price.
2. The technical report **CEN/TR 17519** includes the risk management measures necessary to avoid microplastic releases from artificial turf pitches.
3. There is no alternative for artificial infill outside the definition of microplastics able to fulfil the same performance requirements, and no alternative can achieve the **environmental benefits** of end-of-life tyre recycling.
4. A derogation for polymeric infill with the condition that **risk management measures** are in place is the best option from the environmental and socio-economic point of view.

Example of traceability in the recycling value chain

CERUB®- The first international sustainability system for material recovery

The tyre industry is the first industry to establish an international sustainability label for the joint pursuit of the *circular economy*.

The purpose of CERUB is to accelerate the reuse of the tyre materials and ensure that the entire recycling chain lives up to the *highest standards, in terms of environment and health*.

A CERUB® labelled material is a guarantee for a responsible production chain and that it has a transparent material flow.

Compliance and approval are checked by the third-party certification, thus ensuring *traceability* and documentation at all levels.

The sustainability label CERUB® is a guarantee that the material **meets all regulatory requirements** regarding the environment and *safety for the intended end-use*.



CERUB® End-use specific certification



Company & country

Company's operations nationally



Manufacturing process

Stationary / mobile processing



Fraction produced

Powder / granulate / shred / entire tyres

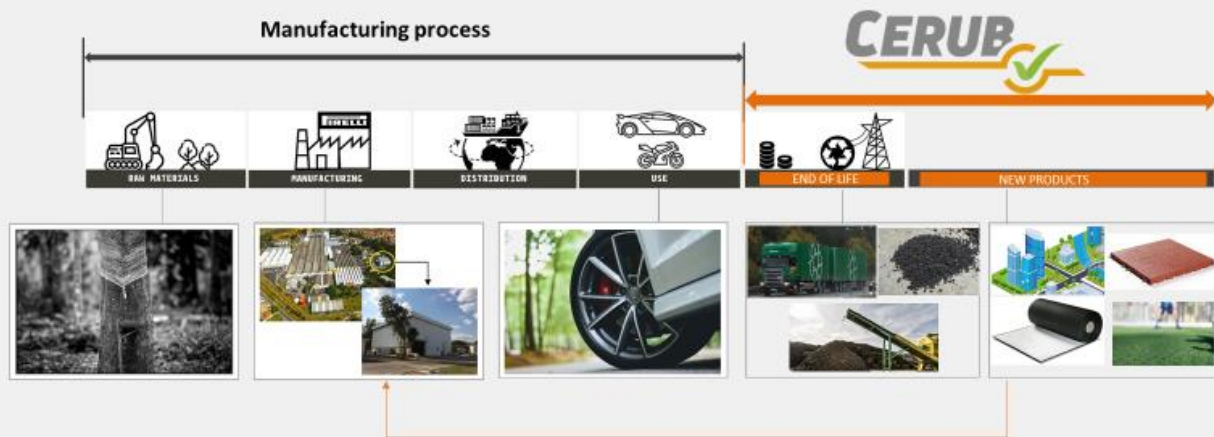


End-use application

Energy / civil engineering / sport turfs / moulded products / other applications & products

Guarantee for responsible processes, *traceable, transparent material flows* and production chain
Guarantee that the material is safe to use for the intended end-use application!

CERUB completes a fully traceable life cycle



Six certification principles

The CERUB® label – The organisation using the label guarantees that the End-of-life tyre derived rubber is produced according to the principles:



+ A set of minimum criteria to ensure that the materials are produced and delivered to markets according to the principles.

3rd party verification

International auditor network - Verification partner DNV GL Business Assurance

One door service – Centralised international audit manager, one contact for all

Consistency of Audits - Auditor introduction process to new Auditors; Consistency evaluation process for Audit performances; Assessment criteria & documentation requirements



Labelling system with company license code for traceability. Certified materials and products are published in www.cerub.org

THANK YOU!

More information and contact

www.cerub.org

info@cerub.org

Let's talk!

Anders Färnlöf, Chairman of the Board

anders.farnlof@sdab.se

Pirjo Rinnepelto, General manager

Pirjo.Rinnepelto@apilagroup.fi



Thanks for your attention / Background documents

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