



Annex XV restriction report - proposal for a restriction on intentionally added microplastics

Position paper of European synthetic turf manufacturing value chain representative trade associations, with respect to proposed ban on the sale of polymeric infills for use in synthetic turf sports surfaces

This position paper has been prepared by the European Synthetic Turf Council (ESTC) and the European Recycling Industries Confederation (EuRIC). It reflects our current joint position (April 2020) on the most appropriate way to minimize the loss of infill from synthetic turf sports fields.

ESTC is 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. Further details may be found at <https://www.estc.info>.

EuRIC - The European Recycling Industries' Confederation - is the umbrella organisation for recycling industries. Through its Member Federations from 21 EU&EFTA countries, EuRIC represents on average: 5,500+ companies generating an aggregated annual turnover of about 95 billion €; 300,000 local jobs which cannot be outsourced to third EU countries; million tons of waste recycled per year (metals, paper, glass, plastics, textiles, tyres and beyond). Further details may be found at <https://euric-aisbl.eu/>

Executive position

- ▶ We strongly support limiting infill loss from synthetic turf fields into the environment.
- ▶ Experience gained over the last three years shows this can be achieved by incorporating Risk Management Measures (RMM) in the form of containment features, such as those described in European Standards Committee (CEN) Technical Report CEN/TR 17519¹, into the design of synthetic turf sports fields.
- ▶ We believe that a ban (either immediate or after a transitional period) on the use of polymeric infills is a disproportionate way of controlling the loss of infill and will have a significant adverse social and economic impact on communities that rely on these sports facilities for social participation and health benefits.

- ▶ To ensure all fields throughout Europe incorporate containment measures we encourage the European Union to make them mandatory for all new synthetic turf sports fields. Additionally, they should be retro-fitted to all existing fields as soon as possible, or at the latest when the field is next resurfaced. This can be best achieved by making the use of containment measures a condition of derogation for the sale of polymeric infills, from the proposed REACH restriction.

Background

- ▶ Synthetic turf systems offer significant benefits to society due to their ability to sustain levels of high use throughout the year, in most weather conditions^{2,3}
- ▶ Infill release is actually significantly smaller than originally estimated^{4,5} and the use of containment reduces this even further.
- ▶ Appropriate alternatives are not available for the whole of Europe^{2,3}
 - Replacement with natural turf is not a cost-effective, feasible, or sustainable alternative
 - Organic infill materials such as cork are not a viable alternative in many markets due to their incompatibility with the climate. There is also insufficient availability to replace the needs of future fields and the vast majority of existing fields that will need replacing prematurely.
 - Systems using sand or no infill fail to provide suitable sporting characteristics and can increase the risk of injury through carpet burns and abrasions.
- ▶ Studies show that Risk Management measures can reduce the loss to the environment by 90% or more⁵.
 - Systems of sustainable practices based on the containment features described in the new CEN Technical Report FprCEN/TR 17519 are now being incorporated into the standards, guidance, and certification programmes for fields used for football, rugby union, rugby league, hockey, and Gaelic games
 - Voluntary measures such as the promotion and education on deployment, maintenance, best practices to avoid the loss of polymeric infills into the environment⁶ and responsible end of life recycling are being taken already by FIFA, UEFA, World Rugby, Rugby Football League, Gaelic Games Association, numerous national football associations, ESTC, EuRIC⁶, Cerub⁷ and others;
 - Synthetic turf system recycling is becoming established practice and should be promoted to increase environmental disposal. Advanced recycling techniques cleanly separate the synthetic turf systems into material streams and enable the recycling of the polymeric infill and other components – a sustainable step towards circularity.
- ▶ **Anything except a derogation will be the equivalent of an immediate ban**

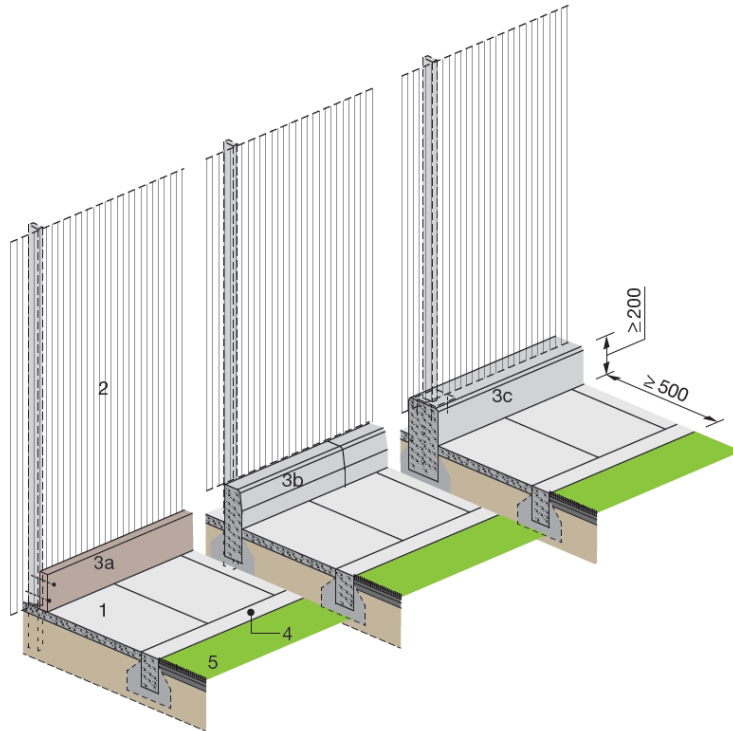
A ban takes immediate effect, even if a transition period is granted. New installations and resurfacing of existing fields with polymeric infill will rapidly come to an end as municipalities, sports clubs and funding agencies refuse to commit such significant investments into surfaces with an uncertain future. The result will be a significant reduction in opportunities for people to participate in sport.
- ▶ **Most** existing fields will need to be replaced prematurely as it is not possible to just change a polymeric infill for an organic alternative.

- Due to the configuration of the synthetic turf system it is not possible to just replace one component with another without player safety and performance being compromised. This means most existing fields will have to be replaced prematurely, as it will not be possible to maintain them adequately once the polymeric infill is no longer commercially available. If only 60% of the existing fields in Europe are replaced prematurely, this will cost in excess of €1.5 billion and create over 95 million square meters of waste carpet and 1 million tons of waste infill, much of which will end-up in landfill or incineration⁷.
- A restriction on polymeric infills for use in synthetic turf will be very expensive for society. This was concluded in ECHAs analysis of 2019, where the impact of end of life tyres derived crumb rubber was analysed⁸.
- Although the cost of the risk management measures will increase the cost of synthetic turf fields (albeit by less than 1%), this cost, especially over a typical 10 year life cycle, will be no more than, and possibly less than, the cost of the alternative options being considered.

References:

- 1 CEN Technical Report FprCEN/TR 17519 - Surfaces for sports areas - Synthetic turf sports facilities - Guidance on how to minimize infill dispersion into the environment
- 2 UEFA and various national football association's submissions to ECHA
- 3 ESTC submission to ECHA dated 19/05/2019, ETEMA submission to ECHA dated
- 4 Teknologisk Institut – Massebalancer af gummigranulat fra kunstgræsbaner_2018
- 5 Regnell 2019; Dispersal of microplastic from a modern artificial turf pitch with preventive measures - Case study Bergaviks IP, Kalmar
- 6 Report on the 'Implementation of Best Practices in synthetic turfs to avoid the release of microplastics from rubber granulate into the environment', EuRIC, 24 February 2020.
- 7 ESTC submission to ECHA dated 21/08/2019
- 8 ECHA 2019; Opinion on Annex XV dossier proposing restrictions on Polycyclic-aromatic ECHA/RAC/RES-O-0000001412-86-279/F, dated 14/06/2019

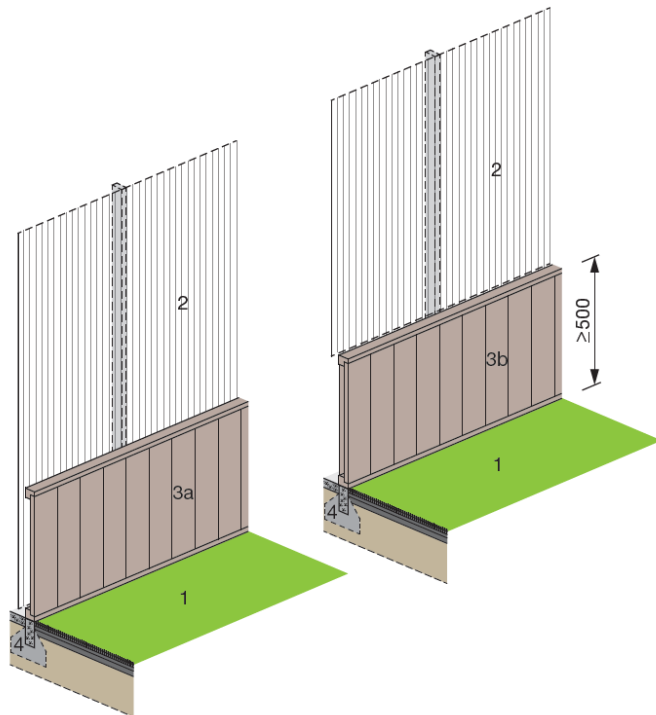
Examples of proposed risk management methods (taken from CEN Technical Report FprCEN/TR 17519)



Key:

- 1 Hard paved zone between synthetic turf and fence
- 2 Perimeter fencing
- 3a Timber or plastic board
- 3b Pre-cast concrete kerb with fence mounted behind
- 3c Cast concrete edging with fence mounted above
- 4 Edge detail of synthetic turf field
- 5 Synthetic turf surfacing

Raised perimeter edging details, used when a field has a paved margin between the synthetic turf surface and the perimeter fence



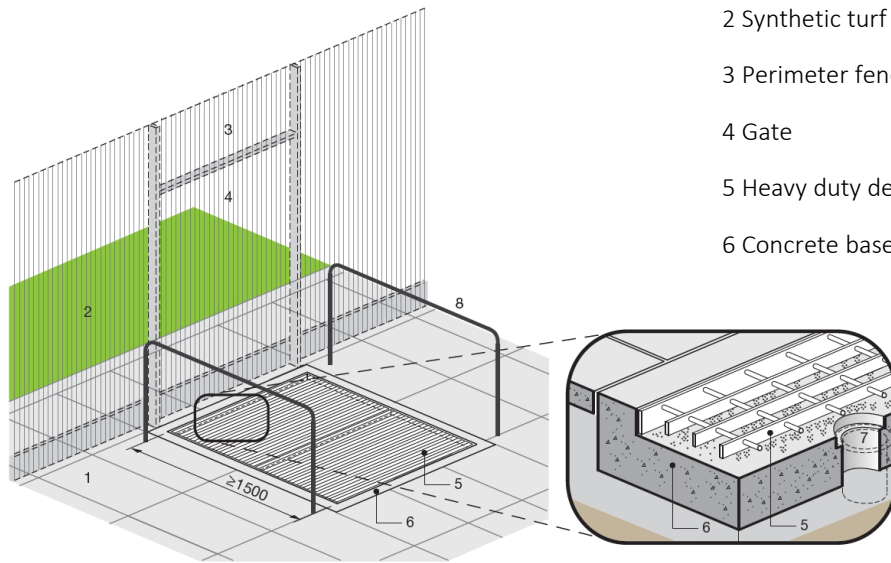
Key:

- 1 Synthetic turf surfacing
- 2 Perimeter fencing
- 3a Fencing boards mounted in front of fence (may be used on new-build fields or be fitted to existing fields)
- 3b Fencing mounted above boards - most suited to new fields and fencing systems
- 4 Perimeter kerb

Perimeter fencing with containment panels used when the synthetic turf surface is laid up to the perimeter of the field

Key

- 1 Area outside field
- 2 Synthetic turf surfacing
- 3 Perimeter fencing with raised kerb
- 4 Gate
- 5 Heavy duty decontamination grates / mats
- 6 Concrete base with drain and silt trap



Decontamination / boot cleaning grate (located outside all entrances)