To whom it may concern,

July 2020

Information on the current EU debate on the use of rubber granulate in artificial turf pitches

We are writing this letter of information because the European Chemicals Agency (ECHA) is in the process of restricting the use of intentionally added microplastic particles.

In relation to the use of rubber granulate in artificial turf pitches, two options are being considered:

1. A total ban on the use of rubber granulate in artificial turf pitches – with a 6-year transition period.
2. An exception to this ban for this particular application – provided that the migration of micro-plastics is kept below 7 g/m2 (equivalent to approx. 50 kg on a pitch measuring 105 x 68 m).

What are the RAC and the SEAC – and what is the next step in the EU?

On 10 June 2020, the RAC (the ECHA Risk Assessment Committee) presented its recommendations in relation to the restriction proposal. The RAC recommends to ban the use of rubber granulate in artificial turf pitches.

There will now be a consultation period, during which all stakeholders can study the committee's recommendations, and submit their objections, which Genan is in the process of doing in cooperation with our European trade association.

Given the comments received during the consultation period, the SEAC (the ECHA Committee for Socio-Economic Analysis) will make its recommendations seen from a wider, socio-economic angle.

This broader perspective will take into account the consequences which such ban will have on a number of aspects, which are not exclusively related to environmental impact. The RAC and SEAC recommendations are equally weighted, and both recommendations will be forwarded to the EU Commission by ECHA.

Why ban instead of preserving a sustainable solution?

Recycled rubber from end-of-life (ELT) tyres has been used for decades as a sustainable and extremely functional component of artificial turf pitches.

According to a recently published LCA study, 280,000 tonnes of CO_2 emissions are saved at European level as a direct benefit of this sustainable use, for which over 400,000 tonnes of end-of-life tyres are recycled each year.

Naturally, such application in artificial turf pitches must be environmentally responsible for this to be a good idea. That goes without saying. Otherwise, one climate problem would simply be replaced by another.

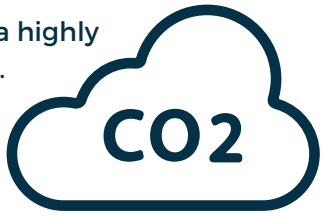
A ban will increase CO_2 emissions significantly

Instead of a ban, Genan recommends the implementation of ECHA's second proposal – to require means to ensure that the granulate stays on the pitches. Precautionary measures such as the mounting of sideline panels, mesh gratings and filters are well-proven, and e.g. in Kalmar, Sweden, a pitch was laid two years ago which has proven that discharge should be measured in grammes, and not in kg per pitch per year. With the right measures, the spreading of microplastics to the aquatic environment can be reduced to next to nothing.

Following this course, we furthermore retain the most significant climate benefit: that tyres are mechanically recycled instead of being incinerated.

When it comes to mechanical tyre recycling, we can indeed all agree that this is the best solution in terms of climate protection. Nevertheless, more than 1 million tonnes of tyres are incinerated in the EU each year. If the use of rubber granulate in artificial turf pitches is banned, this figure will increase by 40% in the EU – equivalent to 400,000 tonnes of tyres, or 280,000 tonnes of CO_2 emissions. Fact is that no less than 250 million trees will need to be planted in order to neutralise this amount of CO_2!

A ban on the use of rubber granulate in artificial turf pitches will thus prohibit a highly functional recycling flow, to the detriment of the environment and the climate. Because what would then happen to the 400,000 tonnes of tyres, equivalent to 40 million end-of-life tyres, that need to be disposed of each year?



Genan supports tight legislation on intentionally added microplastics

At Genan, we are highly committed to the environment, the climate and sustainability. That is what our entire business is based on. Naturally, we support the limitation of the discharge of microplastics into the natural environment and the ocean – that goes without saying. We support research, and we work to inform and educate clubs, municipalities and companies installing artificial turf pitches. If artificial turf pitches are installed, maintained and used properly, the amount of rubber granulate that ends up in the environment will be infinitely small.

For the same reason, we also want our politicians to set clear, strict rules for the handling of "intentionally added microplastics" in connection with use in artificial turf pitches – to ensure that such use does not create an environmental problem in the form of infill spreading from pitches to the environment.

The precautionary measures necessary are already well-known and documented, at national as well as European level, which is why the task is now primarily to encourage political will to legislate within this field.

What about public health?

An artificial turf pitch with recycled ELT rubber provides the best playing surface and the highest level of safety for players. It is also a sensible solution in terms of cost, and material is indeed available in the relatively large amounts needed.

There are around 17,000 full-size artificial turf pitches in Europe, an estimated 75-80% of which are made using recycled rubber granulate from car tyres.

If such use is banned, the price of most new artificial turf pitches will increase, and pitch quality will decrease.

The result will be fewer pitches and lower quality, and consequently less opportunity to play sports all year round, which at the end of the day will be a problem for public health, not to mention a large number of local clubs and associations.

At Genan, we will do what we can to ensure that this will not happen!

Not by continuing to build pitches as they have always been built, but by fighting for clear, strict regulations on the design of sustainable artificial turf pitches – with infill that comes from a green recycling flow in the form of recycled ELT, and with infill material that stays on the pitch!

How we act

In cooperation with our European trade association, Genan is already in the process of preparing information and material for this further process. By the end of June, the SEAC will present its "draft opinion", which will then be open for consultation for a period of two months.

In the meantime, it is important to emphasise that the recommendation made by ECHA's Risk Assessment Committee is a focused, technology-based, environmental risk assessment and the first step in a long process, which will subsequently be considered from a broader, socio-economic perspective – and be subjected to a final, political decision-making process.

There is thus no substance to claims that the EU recommends to ban the use of ELT rubber granulate in artificial turf pitches, nor is the installing of pitches with ELT infill banned. We are still a long way from a final decision, and there has been no final say in this matter, which, at the end of the day, is about the EU's overall ambitions not just in respect of the environment – but also in relation to public health and the climate.

Yours sincerely

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