

ETRMA views on the restriction of intentionally added microplastics

Brussels, 25th March 2021

The proposed restriction on intentionally added microplastics aims to minimize the risk of microplastic releases to the environment and marine waters. The European Chemical Agency has identified a risk on potential releases from polymeric infill materials use in artificial turf fields. Two policy options are proposed by ECHA option A) a total ban in six years time, irrespective of social and economic costs or option B) Mandatory use of risk management measures, with effect on new and all existing fields within 3 years.

SEAC concludes that based on the available cost and benefit information and SEAC's analysis of that information, a clear advice on which scenario should be preferred is however not possible. A clear cut choice for one of the scenarios can, in this case, only be taken based on policy priorities.

ETRMA agrees with the EU ambition to avoid leakage of plastic materials to the environment. **The establishment of risk management measurements on artificial turf fields will accomplish that goal and will prevent unintentionally releases to the environment. A ban on rubber infill is unjustified and disproportionate, and there is insufficient evidence to support a science-based ban.** Efficient and viable alternative risk mitigation measures are available.

The development of the artificial turf fields in Europe evolved hand in hand with the availability of high quality low cost material as ELT derived rubber granules. Infill materials derived from end-of-life tyre (ELT) recycling constitutes a substantial share of the infill used in artificial sports fields across Europe. Their unique infill properties (e.g., high shock absorption, low skin friction, resistant to weathering) makes them ideally suited for sports with a high usage demand such as football. The recovery and use of rubber granulates has a very beneficial environmental footprint, sparing the environment with 350,000 tonnes of CO₂ eq. emissions annually in the EU¹, which are comparable to the amount of CO₂ absorbed by 175,000 hectares (approx. 300 million trees) of forest land².

Industry supports the implementation of Risk Management Measures. Guidelines and standards are available³. Risk Management Measures can be effective. The legal framework requesting the implementation of RMM are available to control the release of rubber granulates⁴. Inspections show no spread of the material outside of the fields when measures are properly implemented. Risk mitigation in the form of containment measures are easily implementable and are economically viable.

ETRMA does not support a ban on polymeric infill materials in artificial turf fields and urges the European Commission and Member States to re-assess the decision of the proposed restriction, taking into account the broader environmental and socio-economic impacts, as well as the significant mitigating actions already undertaken, to solve issues regarding the avoidable spread of infill materials.

¹ Institut für Energie- und Umweltforschung Heidelberg GmbH, for GENAN Holding A/S (2020). Life cycle assessment of waste tyre treatments: Material recycling vs. coincineration in cement kilns, Force Technology with contribution by ifeu –Retrieved from: https://www.euric-aisbl.eu/images/PDF/LCA_tyre_recycling.pdf

² European Parliament News (2018). Climate change: using EU forests to offset carbon emissions (Eurostat).

³ CEN standard "CEN/TR 17519:2020 Surfaces for sports areas – Synthetic turf sports facilities Guidance on how to Minimize Infill Dispersion into the Environment" in June 2020

⁴ The principle of duty of care is applicable at a European scale in the "Directive 2004/35/CE of the European Parliament and of the Council of 21 April 2004 on environmental liability with regard to the prevention and remedying of environmental damage", the Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy, and the Directive 2006/118/EC of the European Parliament and of the Council of 12 December 2006 on the protection of groundwater against pollution and deterioration.

We would like to raise the following important points of attention:

Environmental effects of infill releases are negligible. The proposed restriction is based on a misunderstanding on the compaction of infill. The 16,000 tonnes / year used in restocking in Europe are to compensate for this recurring phenomenon of compaction and not to compensate for the effects of dissemination in the environment⁵.

Furthermore, the spread that can occur is limited to the vicinity of the fields and is easily avoided and cleaned up if it occurs due to human interventions^{5 6}. It is proven that the distribution is caused by human interventions and is not a result of natural forces such as rain or wind. It is also worth reminding that there are no health risks for users of End-Of-Life Tyre infill material.⁷

A ban of polymeric infill will compromise 37% of the End of Life Tyres derived rubber market, accounting for 527 000 tones of ELT-granulate⁸. Recycling of tyres to rubber infill has considerable environmental benefits in terms of waste streams, material and energy saving and reduced CO₂ emissions⁹. A ban would have significant impact on Europe's environmental footprint and affect local communities to meet its recycling targets. Since there are not ready developed markets for such amounts of ELT derived rubber, the ban would force the need to increase the already scarce capacity of energy recovery.

A ban will have major consequences on an every day's life of sport communities. The development of the artificial turf field in Europe goes hand in hand with the availability of high quality low cost material as ELT derived rubber granules. A complete ban will reduce the availability of fields affecting social participation. As there are not ready available technical and economical alternatives, the cost of synthetic turf fields will significantly increase and reduce the availability of ELT derived rubber for maintenance of current fields.

About ETRMA

The European Tyre & Rubber Manufacturers Association (ETRMA) represent nearly 4.400 companies in the EU, directly employing about 370.000 people. The global sales of ETRMA's corporate members represent 70% of total global sales and 7 out of 10 world leaders in the sector are ETRMA Members¹⁰. The product range of its members is extensive from tyres to pharmaceutical, baby care, construction and automotive rubber goods and many more applications. We have a strong manufacturing and research presence within the EU and candidate countries, with 93 tyre plants and 16 R&D centres.

⁵ Verschoor et al., 2021, Fate of recycled tyre granulate used on artificial turf, Environ Sci Eur, <https://enveurope.springeropen.com/articles/10.1186/s12302-021-00459-1>

⁶ Magnussen and Macsik, 2020, Fate of recycled tyre granulate used on artificial turf, <https://www.estc.info/publications/the-effectiveness-of-risk-management-measures-to-minimize-infill-dispersion/ecoloop-report-effectiveness-rmms/>

⁷ ERASSTRI part 1, 2 and 3, <https://www.sciencedirect.com/science/article/pii/S0048969720306847>

⁸ Based on data on material recycling markets up to 2017

⁹ Multiple LCA studies are available. For Example EURIC, 2020, LCA STUDY DEMONSTRATES POSITIVE CLIMATE AND ENVIRONMENTAL BENEFITS OF THE RECYCLING OF END-OF-LIFE TYRES FOR ARTIFICIAL TURF PITCHES, <https://www.euric-aisbl.eu/position-papers/item/398-euric-factsheet-lca-tyre-recycling-environmental-benefits>

¹⁰ ETRMA's membership: APOLLO VREDESTEIN, BRIDGESTONE EUROPE, BRISA, COOPER TIRES, CONTINENTAL, GOODYEAR, HANKOOK, MARANGONI, MICHELIN, NOKIAN TYRES, PIRELLI, PROMETON, SUMITOMO RUBBER INDUSTRIES and TRELLEBORG WHEEL SYSTEMS. Furthermore, members include Associations in the following countries: Finland, France, Germany, Hungary, Italy, the Netherlands, Poland, Spain and the UK.