

Written communication to Nordic Ministers regarding the potential ban on rubber granulate as performance infill in artificial football turf pitches

A ban on rubber infill would be socio-economically expensive and have a negative impact on the environment

A review is currently underway within the European Chemicals Agency, ECHA, regarding the regulation of intentionally added polymers in various products. This is to prevent the discharge of polymers in the shape of microplastics into natural environments. Within the framework of this process, the issue of regulating rubber granulate as performance infill in artificial football turf has been raised. The most common infill material is SBR rubber, which is made from recycled tyres.

The review has resulted in two alternatives. One option entails a total ban on the use of polymeric granulate and the other entails less extensive, and significantly more cost-effective, risk minimisation measures.

The European Commission is expected to present its final proposal in June 2021. This will be followed by negotiations with the Member States, the EU Council, and the European Parliament in preparation for a final decision and possible implementation in 2022.

Recycled tyres have a positive impact on the environment

Historically, there has been some concern about discharge of polymers in the shape of microplastics into natural environments. However, no studies have proven that the use of granulate in artificial turf leads to increased levels of microplastics in the surrounding area. The data on which ECHA is basing its proposed restrictions is founded on hypothetical "worst-case scenarios" in Europe and does not take into consideration the fact that the material becomes compacted when played upon. Actual measurements show that discharge from pitches can be reduced to as little as 10 grammes per pitch and year.

From a life cycle perspective, SBR rubber has a lower CO₂ footprint than the alternatives currently available on the market. Alternative materials have a significantly greater impact on the climate than recycled tyres when considering climate emissions, how much fossil fuel energy is used, acidification and the use of agricultural land. In addition, turf with these alternative infill materials has a shorter service life and cannot be recycled again when the pitch is to be replaced.

The Swedish Institute for Standards, SiS, and the European Committee for Standardization, CEN, have developed a standard for construction and maintenance to achieve reduced discharge from artificial turf. This includes, among other things, installing filters in surface water drains, boundary barriers around pitches and setting up designated surfaces where players can brush the material off before leaving the pitch. In other words, granulate discharge is primarily a question of maintenance, not intrinsic to the material itself. By implementing the standard which has been developed, and clarifying management guidelines for municipalities, we can achieve greater environmental benefits than a total ban would lead to. Several organizations pointed this fact out in their responses to ECHA, who asked their Risk Assessment Committee (RAC) to update its analysis. Following its update, the RAC concludes that risk minimization measures (RMM) are in fact an effective way to reduce granular waste to meet the strict proposed maximum limit for infill losses.

A ban would make it impossible to play football all year round

One artificial turf pitch with rubber infill is equivalent to up to 10 natural grass pitches, in terms of annual playing time. Without artificial turf, the number of hours of exercise per person would be significantly lower, especially in the Nordic part of Europe, where it would be impossible to take part in sports outdoors during the winter.

The Nordic football associations have written a joint letter to the ECHA about the enormous consequences a total ban would have on football in the Nordic countries since there are no alternatives which work in our climate. If a total ban on rubber granulate were to be imposed, it would reduce the number of usable pitches and thus young people's opportunities for year-round physical activities outdoors.

Enormous costs for municipalities and local clubs

SBR rubber is, in all aspects, the most economically feasible material available on the market. If this material were to be banned, it would significantly increase costs for municipalities in the Nordic countries, and ultimately for the clubs which use artificial turf.

The difference in the total cost of construction per football pitch between artificial turf with SBR rubber as infill material and artificial turf with one of the most common alternatives on the Nordic market is €195,000. For all the 3 800 pitches in Sweden, Norway, Denmark, and Finland, it would result in an increased cost of nearly €750 millions. This does not include the fact that the total environmental benefit would be at best very small, but probably negative, and that the quality of biodegradable alternatives is perceived by those who use the pitches to be lower.

The ECHA's analysis states that the total cost of introducing regulation throughout Europe will be €10.8 billion over twenty years if the risk minimisation option is chosen and as much as €19.1 billion over twenty years in the event of a total ban. According to the ECHA, the additional cost of a total ban would thus be €8.3 billion. We strongly question the basis for the ECHA's calculations, not least the societal benefit of regulation in relation to the cost. Instead, we propose that the restrictive measures advocated by the CEN, the European Committee for Standardization, and SiS, the Swedish Institute for Standards, which are estimated to have a cost of up to €19,500 per pitch, be introduced.

Granulate makes informal sport possible for our children year-round, without harming the environment

For twenty years, SBR rubber has been successfully used as infill in artificial turf across Europe. It makes casual sport possible throughout Scandinavia, year-round, and is appreciated by players. SBR has been used as infill for many years and in all that time no negative effects on the environment have been demonstrated. SBR granulate has not been detected in the sea or in aquatic organisms.

We now appeal to you, Nordic Ministers, to take a stand, nationally and within the EU, for the restrictive measures advocated by the CEN and the SiS, instead of a total ban on the material, so that we can continue to enable football and informal sport for children and young people year-round in the Nordic countries.

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