



# Q&A: THE EU COMMISSION WANTS TO BAN SALES OF RUBBER GRANULATE AS INFILL FOR ARTIFICIAL TURF PITCHES AS OF 2031

## 1 HAS A NEW LAW NOW BEEN ADOPTED, BANNING THE USE OF RUBBER GRANULATE IN ARTIFICIAL TURF PITCHES?

No. The EU Commission has decided to submit a legislative proposal to the Council and the European Parliament, one consequence of which would be the banning of sales of rubber granulate – regrettably also recycled rubber granulate – as infill for artificial turf pitches – with an 8-year transition period counting from formal approval in the EU. There is a strong probability that the proposal of the Commission will be adopted in autumn 2023. If so, it will no longer be possible to sell rubber granulate as infill for artificial turf pitches as from autumn 2031.

## 2 WHEN DO WE KNOW IF THE PROPOSAL OF THE COMMISSION WILL BE ADOPTED IN THE EU?

During the next three months, the Council and the Parliament may object to the proposal. In the unlikely event that either a qualified majority in the Council or a simple majority in Parliament votes to object to the proposal of the Commission, work will in principle be returned to the REACH Committee and the Commission. The institutions (Council and Parliament) are not obliged to vote on whether to object to the proposal, so if they do nothing for the next three months, the proposal will be adopted. Subsequently, a more formal legal process begins, meaning that this legislative act will then most likely be formally adopted and apply from around October/November 2023. It will then be 8 years before it is no longer permitted to sell rubber granulate as infill for artificial turf pitches.

## 3 WHICH COUNTRIES WILL BE AFFECTED BY AN EU BAN ON THE USE OF RUBBER GRANULATE AS INFILL?

The legislative proposal in question – also referred to as the microplastics restriction – will apply in the 27 EU member countries. A ban will thus not apply outside the EU – and consequently not in Norway, Greenland, Iceland, the Faroe Islands, Great Britain, Turkey, Serbia, North Macedonia, Montenegro, Moldova, Bosnia and Herzegovina, Albania and Ukraine. Nor will it apply on other continents.

## 4 IS IT NOW NO LONGER ALLOWED TO INSTALL ARTIFICIAL TURF PITCHES WITH GRANULATE FROM TYRES?

Yes, it is. For the next 8½ years, it is permitted to install new pitches and perform maintenance on existing pitches with rubber granulate as infill. After this time, pitch owners must have rubber granulate in stock if refill is needed. If pitches have the right containment measures and are maintained properly, the need for refill should be limited.

## 5 WILL IT THEN BE PROHIBITED TO PLAY ON ARTIFICIAL TURF PITCHES WITH RUBBER GRANULATE IN 8½ YEARS' TIME?

No, it will not. People can play on artificial turf pitches with rubber infill for as long as pitches can last. As long as a pitch is installed before the end of the transition period, which will supposedly be in autumn 2031, people can play on it until e.g. 2045, if it is properly maintained.



## 6 DOES THE PROPOSAL OF THE COMMISSION PUT A STOP TO THE IMPLEMENTATION OF CONTAINMENT MEASURES?

One could argue that the Commission has chosen not to give pitch owners an incentive to make an effort to prevent the dispersal of infill with this proposal. In our opinion, that is unfortunate for the environment and also incomprehensible. At Genan, we will thus continue our work to provide documentation of and knowledge about how to prevent the dispersal of rubber granulate from artificial turf pitches. We will do this, so pitch owners implement the right containment measures. In this way, the functionality of artificial turf pitches can be maintained, pitch life can be optimised, and the spreading of microplastics to surroundings can be minimised.

## 7 WILL A POTENTIAL BAN AFFECT THE FINANCIAL SITUATION OF GENAN?

It is difficult to predict market reaction during the 8-year transition period. On the one hand, there is a risk that market reaction will be somewhat circumspect, but on the other hand, the transition period also opens a window for the installation of good, functional and long-lasting pitches - for the benefit of public health. Throughout the transition period, it is possible to purchase refill material for pitch maintenance (i.e. until the end of 2031). Prior to the expiry of this deadline, pitch owners must then stock up on rubber granulate for maintenance to last throughout the remaining life cycle of the pitch. Out of the total amount of Genan rubber granulate sold each year, the percentage used for artificial turf pitches has decreased over a number of years. For Genan, dependence on this market segment is thus declining.

The proposal of the Commission has not made Genan management revise its financial expectations.

## 8 WILL THE COMMISSION PROPOSAL CHANGE THE RAISON D'ÊTRE AND LONG-TERM STRATEGY OF GENAN?

No, there will still be both room and need for Genan to recycle the many end-of-life tyres in Europe. Genan's strategy will still be to contribute to solving the large task of developing sustainable applications for worn-down tyres. If the proposal of the Commission is adopted into law, this task will just become all the more crucial, as the decision at EU level has then been to remove a well-established, sustainable application for 500,000 tonnes of tyres annually.



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