

MEMO

The EU Commission wants to ban sales of rubber granulate as infill for artificial turf pitches as of 2031

At a meeting in the REACH Committee, the EU Commission has now decided to submit a legislative proposal to the Council and the European Parliament to limit the spreading of intentionally added microplastics. In this connection, the Commission proposes to ban 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.

The EU has thus not yet adopted a ban on the use of rubber granulate, but there is a strong probability that they will, and that this legislative proposal will be adopted in autumn 2023. If this happens, it will no longer be possible to sell rubber granulate as infill for artificial turf pitches from autumn 2031 onwards. Until that time, however, constructing artificial turf pitches with rubber granulate as infill material is permitted.

Throughout the EU process, the position of both Genan and our European industry association (EuRIC) has been clear: a ban is not the right solution. We have worked to promote the implementation of containment measures, referred to as Risk Management Measures or merely RMM.

In the EU, the dispersal of microplastics could be reduced by approx. 70,000-80,000 tonnes over the next 8 years, if a solution with containment measures – the so-called RMM solution – were to be chosen instead of a ban. At the same time, pitch owners and users would be spared a number of problems – both financial and in relation to capacity. In Denmark, containment measures have already been installed at many artificial turf pitches, and Denmark does indeed lead the way when it comes to knowledge about sustainable use of artificial turf.

Banning the use of rubber granulate from end-of-life tyres (ELT) as infill in artificial turf would be a huge retrograde step for circular economy, when it comes to the waste stream for end-of-life tyres. A large untapped potential is already latent in the possibility to move 1 million tonnes of tyres annually from a low level in the waste hierarchy – incineration – to a higher level in the waste hierarchy – namely recycling. This can only be done through the development of new areas of application and the furthering of existing applications.

A ban would contribute to the exact opposite scenario, i.e. that tyres will be moved from recycling to incineration or even lower levels in the waste hierarchy, as it is by no means certain that the European cement works will be able to take this extra volume of worn-down tyres. The consequence of a ban would thus be diametrically opposed to the objectives of the European Green Deal and the Circular Economy Action Plan, which are indeed very high on the agenda in the EU.



The proposal of the EU Commission is the worst solution for the environment, the climate, for football, public health, municipality finances and circular economy. We instead support working for an RMM solution, which will even in the short run result in major gains for the environment – without significant cost.

As mentioned above, customers can indeed install new pitches and perform maintenance on existing pitches with rubber granulate as infill for the next 8½ years; but after this time, customers must have rubber granulate in stock if refill is needed. If the right containment measures are projected and installed at pitches, the need for refill should be limited. New results from the test and development project called Silkeborgbanen show that the dispersal of rubber granulate to the environment can be reduced to less than 3 kg a year. For further information on this, read here: <https://silkeborgbanen.eu/new-results-from-silkeborgbanen-april-2023/>

At Genan, we will continue to provide documentation of and knowledge about how to prevent the spreading of rubber granulate from artificial turf pitches. We will do this, so that pitch owners in Europe and the rest of the world implement the right containment measures. In this way, the functionality of artificial turf pitches can be preserved, the service life of pitches can be optimised, not to mention the fact that the dispersal of microplastics to surroundings can be minimised.

Genan will regularly update information about the ongoing political process in the EU and its consequences – as well as about our work to further circular economy, which is indeed crucial for the climate of the future.

Yours sincerely

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