



# Q&A: THE EU COMMISSION HAS BANNED SALES OF RUBBER GRANULATE AS INFILL FOR ARTIFICIAL TURF PITCHES AS OF 17 OCTOBER 2031

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

Yes. In autumn 2023, a new EU regulation was adopted to limit plastic pollution, including microplastics pollutants. The new restriction applies to intentionally added microplastics. The dispersal of microplastics originating from car tyre wear on roads is thus not covered.

The new regulation means that it will no longer be allowed to sell (nor buy) rubber granulate to be used as infill material on artificial turf pitches from 17 October 2031 onwards. Until 17 October 2031, it is still allowed to construct, use and maintain artificial turf pitches with rubber granulate as infill material. From 17 October 2031 onwards, it will still be allowed to use and maintain artificial turf pitches with rubber infill, but if refill of rubber granulate is required, it must be from own stock.

## 2 DOES THIS NEW EU LEGISLATION SPECIFICALLY TARGET RUBBER GRANULATE IN ARTIFICIAL TURF PITCHES?

No. The new rules ban the sale of microplastics and products containing intentionally added microplastics. The definition of microplastics used in EU legislation is broad, covering all synthetic polymer particles which are smaller than 5 mm in every dimension and which are organic, insoluble and non-degradable.

Rubber granules used as infill material in synthetic sports surfacing, including artificial turf pitches, typically measure 0.7-3 mm in diameter and are made of synthetic polymer, meaning that granules can be defined as microplastics. As granulate is intentionally added to pitches, e.g. when artificial turf facilities are installed, the new EU restriction applies.

The EU restriction adopted applies to intentionally added microplastics in many different products, such as:

- Cosmetics
- Detergents
- Toys
- Glitter

Certain products containing microplastics have been exempted in the new EU legislation.

## 3 DOES THE NEW BAN APPLY TO SHOCK PADS MADE FROM RUBBER GRANULATE?

No. Microplastics encapsulated within a matrix – e.g. shock pads which may be made from moulded rubber granules – and used as shock absorption underneath artificial turf, are not covered by the ban.



#### **4 WHICH COUNTRIES WILL BE IMPACTED BY THE EU BAN ON THE USE OF RUBBER GRANULATE AS INFILL?**

The EU restriction will apply in the 27 EU member countries. The 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.

#### **5 IS IT FORBIDDEN TO INSTALL ARTIFICIAL TURF PITCHES WITH GRANULATE FROM TYRES ALREADY?**

No, it is not. Until 17 October 2031, it is permitted to install new pitches and perform maintenance on existing pitches with rubber granulate as infill. From 17 October 2031 onwards, it will still be permitted to use and maintain artificial turf pitches with rubber granulate as infill, but if refill is needed, pitch owners must supply from own stock. If the pitch has the right containment measures, and the pitch is properly maintained, the need for granulate refill will be limited.

#### **6 WILL IT THEN BE PROHIBITED TO PLAY ON ARTIFICIAL TURF PITCHES WITH RUBBER GRANULATE?**

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 prior to 17 October 2031, people will – based on the expected lifespan of such artificial turf pitch – be able to play on it until e.g. 2045, if it is well maintained.

#### **7 WOULDN'T IT BE SAFER TO STOP USING ARTIFICIAL TURF PITCHES WITH RUBBER GRANULATE IMMEDIATELY?**

No. All owners of artificial turf pitches should instead focus on preventing the dispersal of infill and synthetic turf residue from pitches. Good maintenance routines play an important role in this respect.

In connection with the test and development project Silkeborgbanen, run by the Danish Football Association (DBU) and Silkeborg Municipality, experts from the Danish Technological Institute (Teknologisk Institut) have demonstrated how to keep total dispersal of microplastics to surroundings below 3 kg/pitch/year (0.2-0.3 g/m<sup>2</sup>/year).

#### **8 DOES THIS NEW EU BAN PUT A STOP TO THE IMPLEMENTATION OF CONTAINMENT MEASURES?**

One could argue that the EU has chosen not to give pitch owners an incentive to try to prevent the dispersal of infill. In our opinion, this is unfortunate for the environment – and 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.



## 9 WILL THE EU BAN AFFECT THE FINANCIAL SITUATION OF GENAN?

We do observe a market reaction, but reactions are very diverse. Some municipalities (pitch owners) are already contemplating alternative infill types, despite the fact that these alternatives do not offer the same good functionality as rubber granulate. Many other municipalities use the transition period from now until autumn 2031 to install good, functional and long-lasting pitches – for the benefit of public health. The percentage of Genan rubber granulate used for artificial turf pitches has decreased over a period of years. For Genan, dependence on this market segment is thus declining.

The new EU restriction has not made Genan management revise its financial expectations.

## 10 WILL THE EU BAN CHANGE THE RAISON D'ETRE AND LONG-TERM STRATEGY OF GENAN?

No, now more than ever, there is a 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. The new EU restriction has just made this task even more crucial, as the decision at EU level has then been to remove a well-established and sustainable application which is significant to the circular economy of end-of-life tyres.



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