



European Synthetic
Turf Organisation

Technical Insight Newsletter

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ESTO participating in development of new REACH restrictions for infill

Following the media concerns about the potential health risks of using recycled tyre granulate as infill in synthetic turf pitches the European Commission asked the European Chemical Agency (ECHA), in 2016, to investigate the issue to see if the concerns are justified. ECHA is the driving force among regulatory authorities in implementing the EU's chemicals legislation (REACH, etc) for the benefit of human health and the environment.

ECHA undertook a comprehensive review of all the published data and ongoing studies being undertaken in Europe and the USA. ESTO was consulted by ECHA during this consultation process.

In March 2017 ECHA published their report (see <https://echa.europa.eu/-/recycled-rubber-infill-causes-a-very-low-level-of-concern>). This concluded, based on the information available, that there is, at most, a very low level of concern from exposure to recycled rubber granules and the concern for lifetime cancer risk is very low given the concentrations of PAHs typically measured in European sports grounds.

More recently concerns have been raised in the Netherlands about the quality of some materials used to make infill and this has led the Dutch government, in conjunction with ECHA, to propose changes to the relevant REACH Regulations to ensure that rubber granules are only supplied with very low concentrations of PAHs and any other relevant hazardous substances.

As a first step in the preparation of this new restriction, the Dutch Ministry of Health, Welfare and Sport and ECHA recently hosted a workshop, where interested parties were invited to participate in discussing the scope of the restriction. ESTO, as the representative of the European synthetic turf industry attended, were one of 42 Stakeholders present, the others coming from a variety of organizations such as tyre recyclers, tyre manufacturers, academia and alternative infill manufacturers and test institutes.





A key question scheduled for discussion was whether the available data on actual PAH content in infill materials are representative for the whole EU. It was noted that PAH concentrations in tyres and end-of-life tyre (ELT) granules appear to be relatively stable and have gradually been reduced over time due to the extender oil restriction that entered into force in the EU January 2010.

The meeting also discussed the relevant exposure scenarios for the necessary risk assessment. It was explained that the exposure scenarios discussed in the ECHA and Dutch reports will be used as a starting point for the restriction dossier. In this report the focus was on football players and goalkeepers aged between 4 and 50 years that are orally (incidental ingestion) and dermally exposed to infill. Some attendees stated that all relevant exposure scenarios should be included in the risk assessment and an exposure scenario specifically for very young children (0-4 years of age) needs to be included.

Related to the scoping of the restriction proposal, it was asked what infill materials should be included.

The general idea among attendees was that the scope should not only embrace infill made of tyres, but also infill made out of other materials, regardless of whether they are made from recycled or virgin materials, as the aim is to ensure safe use of synthetic turf fields, irrespective of the material they are made of.

Some attention was given to the question of whether infill should be defined as a mixture or as an article and whether there is a difference between infill made from ELT and infill from other (virgin) resources.

It is intended that the draft Restriction proposal will be submitted by the Dutch Government by April 2018. A six-month public consultation will commence in June 2018. Once the public response has been assessed a revised draft of the Proposal will be submitted to the relevant EU committee. They will undertake a further public consultation and if a positive response is reached, the new restriction could be introduced in 2020.





ESTO partnering with ETRMA and ETRA

As a major user of end of life tyre granulate the synthetic turf industry is a significant partner for those companies responsible for the disposal of the tyres they produce, and the companies manufacturing granulate. This has led ESTO to establish working relationships with the European Tyre and Rubber Manufacturers Association and the European Tyre Recycling Association. Sharing information and members views is allowing all three pan-European trade associations to coordinate their responses to the European Commission, ECHA and other regulatory bodies.

One of the biggest benefits of this relationship has been the establishment of the Crumb Rubber Industry Platform, which ESTO is a member of.

Responding to the need for a comprehensive understanding of any health or environmental risks of using granulated tyre infill the Platform has launched a major independent scientific assessment. With this research project a major effort is being made to close remaining data gaps and to come to a robust and scientifically credible comprehensive risk assessment of all substances potentially available from rubber crumb used as infill material in synthetic turf fields in Europe. Initial results will be available in Spring 2018, and will be transferred to the ECHA as part of their proposed REACH restriction development.



ESTO & European Standards

Increasingly European regulations are being enforced through European Standards, developed by the European Standards Committee (CEN). To ensure the European synthetic turf industry is actively involved in the setting of the Standards for synthetic turf sports facilities, ESTO supports the convenor of the relevant technical working groups and attends the meetings, having been given official observer status by CEN.

At present CEN are working on two key standards that will affect the synthetic turf industry. Firstly, they are starting to prepare a harmonised (therefore legally binding) standard for synthetic turf sports surfaces used indoors. This will require the CE marking of synthetic turf products to demonstrate compliance with the standard and therefore the EU's Construction Products Regulations. The new Standard will address issues such as flammability, dangerous substances, durability, etc.

Secondly, CEN is developing a standard for shockpads used in synthetic turf sports systems. Significantly based on the work of the ESTO Shockpad Group, this standard is a direct result of the technical work undertaken by ESTO.

Most recently, and following a proposal by ESTO, CEN has created a task group to prepare a European Standard code of practice for the sampling and testing of infills. It is envisaged the code of practice will allow companies and suppliers to demonstrate compliance with REACH and other regulations for infill quality. ESTO has proposed the new work item to try to ensure there is a Europe wide common approach to this important topic and not a multitude of individual national schemes causing confusion and difficulties in the market place. A call for experts is currently being made via national standards committees (DIN, NEN, AFNOR, etc.) if ESTO members are interested in participating in this important work.





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