

## Recycled rubber infill material will be banned to reduce water pollution



Rhine river in Koln (summer 2022)

This summer will be recalled as one of the hottest and greatest droughts of the last 70 years.

In addition after 77 years of peace we are experiencing the tragedy of a war in Europe which is expected to be long, with all the tragic consequences connected to it: humanitarian, economic, environmental, political, etc.

The cost of energy, which doubled already before the war, has now decupled posing serious concerns about energy availability and affordability and survival of many industries (Tyre Recyclers included) as well as families.

So, while Recyclers who are mainly SMEs are wondering how to overcome the perfect storm announced for the autumn, and how to face above macro-issues, plus others that will come along, the EU Commission, supported by ECHA RAC's opinion, which seems quite inaccurate on artificial turf, decided to face micro-plastics, focusing mainly on infill material, in order to reduce dispersion into the water of tiny fragments of polymers.

Above story seems itself unreal. Tyre Recyclers already are no longer able to granulate tyres owing to the price of electricity. Sports Associations wonder how the infill material can migrate from the pitch to water if there is no water. Farmers say that the little water available should be used to watering crops instead of natural grass. Common people ask if this is Circular Economy.

The whole issue is still unclear and contradictory.

The Dossier Submitters in ECHA's consultation estimated an average release of 500 kg per year from each of 32.000 full size pitches installed, making the total estimation of the annual release equal to 16.000 tons.

This data is wrong and overestimated and we fully contest it. However, if it was true it would make more sense to introduce, now, mandatory risk management measures to limit the dispersion down to 50 kg or less and verifying the effectiveness, then apply the ban and the removal only for the fields that do not comply with the limits.

Instead, the ban will come in force in 6 years, during which polymeric infill material will continue to be sold and pitches installed without containment measures, increasing the number of pitches which have the potential release of 500 kg per year, which, after 6 years will remain operational until their end of life, increasing the overall polluting impact, instead of reducing it.

All this without considering the difference between the size of 1- 2 mm used for infill material and that of a few microns of microplastics used in others and more polluting sectors.

ETRA challenges the decision to ban polymeric infill material and asks for it to be withdrawn as well as requiring economic support for tyre recycling companies to defend themselves from the speculations on energy cost and unsustainable prices.

In Europe 4.200.000 Tons of EOL tyres are produced annually and must be recycled in a sustainable way.

Recycled SBR infill material made artificial turf more sustainable, cost effective and wide spread, contributing to sports diffusion and reducing social discomfort, especially among young people

As there are no benefits deriving from the ban of rubber infill for the environment, nor for the recyclers, as well as for citizens and players, the question arises spontaneously: who will benefit from it ?