

Brussels, 10 November 2015

Reference document: **CARACAL CACS/40/2015 document (9/11/2015)**
Interpretation of entry 50 of Annex XVII of REACH

- The recycling of end of life tyres (ELT) in Europe is highly successful. In total 3.4 million tons of ELTs are annually collected in Europe of which 1.3 million tonnes are processed (shredded and granulated) for recycling. The main recycling outlets of ELT-derived rubber granulates are rubber tiles/shock-absorbing surfaces and rubber infill/synthetic turf, representing about 50% of all ELT-derived rubber granulates applications.
 - Rubber tiles can be divided in stable-, roof- and gallery tiles, fall damping tiles. Stable-, roof- and gallery tiles are only supplied to professional installers like contractors.
 - Rubber infill is a construction material only supplied to professional artificial turf installers and is not sold to the general public.
- ETRMA fully supports the legal analysis presented by the EU COM (see CARACAL CACS/40/2015 document (9/11/2015)): *"buildings do not constitute "articles" for the purposes of Article 3(3) - so long as they remain fixed to the land on which they stand. The same applies to other large structures such as bridges. Smaller objects affixed to land such as garden swings or garden statuary are probably to be treated in the same way. However, once again, if the objects are removed, then they constitute "articles". Therefore, according to this interpretation and insofar as synthetic turf and rubber tiles/mats that are permanently fixed are considered part of the facility or premises where they have been laid, arguably they will not be "articles" for the purposes of entry 50 of Annex XVII."*
- ETRMA also supports the view that rubber infill used in synthetic turf should be considered as mixture under REACH, and it will fall within the scope of entry 28 of Annex XVII which imposes a limit of 0.01% for benzo(a)pyrene and dibenz(a,h)anthracene and of 0.1 % for other PAHs classified as Carc 1B.
- There is clear evidence that no health risks are associated with playing on artificial turf with ELT rubber infill. This is largely supported by the following studies:
 - A human volunteer study of dermal PAH uptake among football players on an ELT turf pitch was performed in 2006 in the Netherlands and published in a peer reviewed scientific journal¹ The study provides actual bioavailability data on the uptake of PAH through the skin in a real life exposure situation during 2 hours play at a football pitch with ELT infill. This

¹ Joost G. M. van Rooij & Frans J. Jongeneelen. Hydroxypyrene in urine of football players after playing on artificial sports field with tyre crumb infill. Int Arch Occup Environ Health (2010).

validated study showed that despite the use of a sensitive biomarker (1-hydroxypyrene in urine) **no significant PAH uptake from the rubber infill could be measured**. This conclusion is supported anno 2015 by the Dutch National Institute for Public Health and the Environment (RIVM)²

- A re-assessment³ of the risk from skin contact with rubber tiles taking the ECHA comments on the PAH restriction proposal dossier into account, was conducted using BaP as a marker. It showed that PAH exposure for young children is well below the lowest value of the Derived Minimal Effect Level (DMEL) proposed by ECHA (5 - 550 pg BaP/kg bw/day).
- Municipalities and local authorities are the most important customers for those applications and are currently renewing their (annual) public tenders for 2016. Therefore, the ECHA guidance should urgently clarify that the scope of entry 50.5 does not apply to synthetic turf / artificial sport grounds and shock absorbing surfaces.
- ETRMA further stresses the need to find a balance between circular economy goals and the environmental goals of REACH and to work for a long term solution which guarantees the sustainable use of secondary raw materials in the economy.

² Website RIVM 2015. FAQ's on rubbergranulates

³ 2015, Dr. J. Van Rooij, European Registered Toxicologist, Ceasar Consult B.V., DETAILED HEALTH RISK ASSESSMENT – CHILDREN PLAYGROUND, Reassessment of PAH exposure among children from granulate/tiles of end of life tyres. Annex I of ETRMA Factsheet (dated 28/10/2015)