



26 September 2016

**Request for clarification to CA/30/2016 tabled at CARACAL meeting of the 29<sup>th</sup> June – 1<sup>st</sup> July as information point 10**

Following the 8 March 2016 meeting of CARACAL the European Commission (cited from the minutes)

*“shared the view of most Member States that the granules are mixtures. It explained that if this view prevailed it might be necessary to consider whether further restrictions are required (...) The Commission thanked the Member States for their reactions and agreed to prepare a paper setting out the legal arguments for distribution to the Competent Authorities. Finally, the Commission informed participants that, unless a Member State would like to propose an Annex XV dossier, it would instruct ECHA to begin an evaluation of the potential risks presented to human health by rubber granules derived from waste tyres”.*

As a mixture, rubber granules are not part of the restriction in entry 50(5) to REACH Annex XVII but have to comply with entry 28 - 30 of the same annex.

In the information point document CA/30/2016 tabled for the CARACAL meeting of the 29<sup>th</sup> June – 1<sup>st</sup> July the Commission then states:

*“the restriction in entry 50(5) covers (...) synthetic turf used on artificial sports fields.*

This statement has caused much confusion as in our industries “synthetic turf” is considered to be the entire system including the infill material.

**Requests for clarification**

Following a recent phone conversation between ETRMA and the European Commission we understand that your document **CA/30/2016** is actually referring to the **synthetic turf carpet**, as described below. **To avoid misunderstanding or misrepresentation may we kindly ask the Commission to confirm this understanding that synthetic turf is referring to the synthetic carpet only and excludes the infill material.**

Kind regards

**ESTO**

**ETMRA**

6. Avenue E. van Nieuwenhuysse

2, avenue des Arts

1160 Brussels

1210 Brussels

[info@theESTO.com](mailto:info@theESTO.com)

[info@etrma.org](mailto:info@etrma.org)

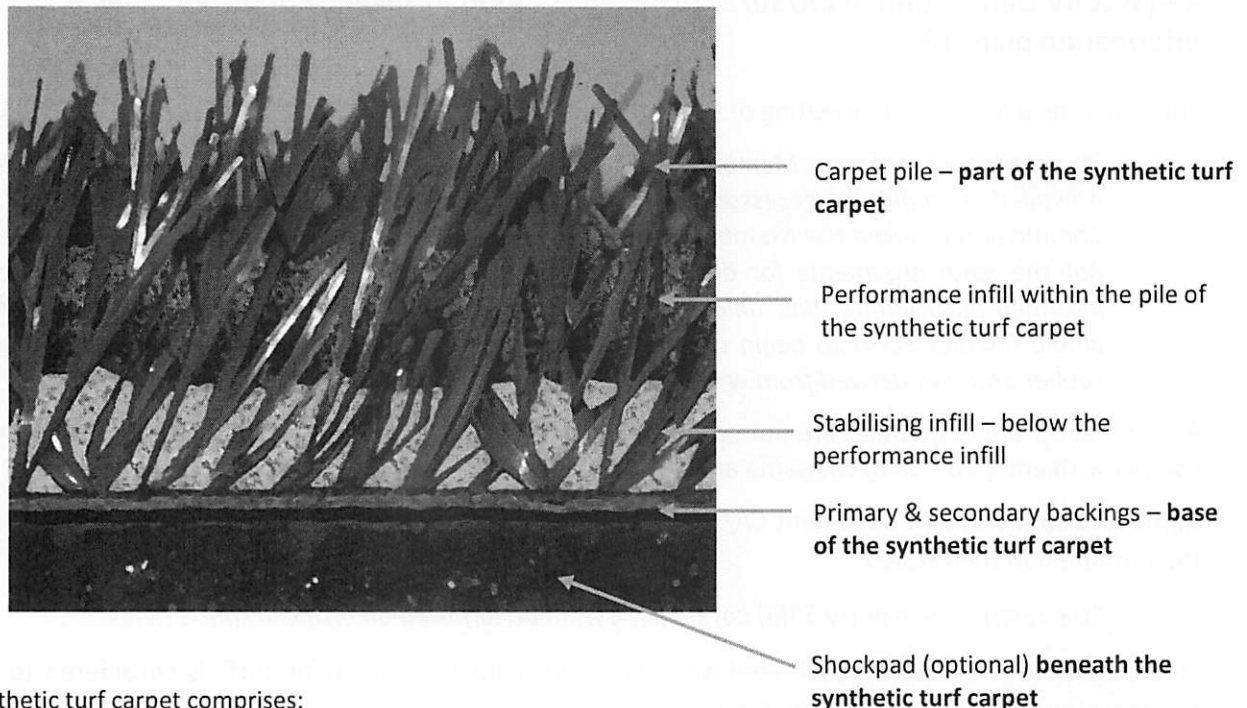
## Background

A synthetic turf sports surface comprises a number of separate components that when laid together form the playing surface. EN 15330-1 (2013) defines a synthetic turf sports surface system as:

*all components of the surface that influence its sports performance or bio-mechanical characteristics including the synthetic turf carpet, infill and shockpad, together with any supporting layers designed to contribute to the performance of the surface.*

This definition is also adopted by various sports federations such as FIFA, World Rugby and the International Hockey Federation.

The figure below illustrates a typical long pile synthetic turf sports surface. As used for sports such as football and rugby.



The synthetic turf carpet comprises:

- Carpet pile - normally polyethylene, polypropylene or nylon
- Primary backing – normally woven polypropylene
- Secondary backing – latex or polyurethane

The performance infill may be:

- Granulated end of life tyre (ELT),
- Granulated ELT coated with polyurethane or latex
- Granulated EPDM
- Granulated TPE or TPV
- Granulated cork
- Granulated cork and coconut fibre

The stabilising infill is normally a round sand

The use of a shockpad will depend on the design of the sports surface. If included in the synthetic turf system, it may be manufactured from:

- Polyethylene foam
- Polyurethane foam
- Polyurethane and ELT granulate
- Other elastic materials