



Ban on SBR rubber granulate artificial grass pitches has far-reaching social, financial and sporting consequences in the Netherlands.

Response of the KNVB to the internet consultation on ECHA 'proposal for a restriction on intentionally added microplastics'

On 13 September 2018 the European Parliament adopted a resolution on a “**European strategy for plastics in a circular economy**” in which it called the European Commission to introduce a ban on micro-plastics, which are “intentionally added” to other products.

Following the EP’s resolution the European Chemicals Agency (ECHA) in Helsinki published a so called “REACH-restriction proposal” and held that the granular infill material (i.e. the granules produced from end-of-life tyres (ELT) or other synthetic elastomeric materials) used in synthetic turf, is consistent with the definition of an intentionally-added microplastic. ECHA therefore proposed an immediate ban of these granulates. Micro-plastics is defined as very small plastic particles with a diameter smaller than 5 mm.

If the restriction proposal entered into force unchanged it would result in an immediate ban of rubber infill as of 2022. From 2022 on, no rubber infill could be used anymore on synthetic turf pitches within the EU.

The Royal Netherlands Football Association (KNVB) considers it important that members can play football safely, pleasantly and healthily on artificial turf pitches. Recent times have taught us that we must continue to collect knowledge, expertise and information on artificial turf pitches in order to obtain as accurate and complete a picture as possible. Such a ban on SBR granules has far-reaching social, financial and sporting consequences in the Netherlands. Postponement of a ban and thorough research into applicable and possible sustainable alternatives are therefore indispensable to prevent unrest in the Netherlands.

Below we give a more detailed explanation of the adverse effects of the ban on SBR granules on the social importance of football in the Netherlands, the importance of artificial grass pitches in the Netherlands, various Dutch studies into SBR granules and possible alternatives to SBR granules.

Social importance of football in the Netherlands

Football is the most popular sport in the Netherlands. The KNVB has 1.2 million members. Every week, the KNVB organises 33,000 football matches, there are more than 100,000 training sessions, 80,000 games are played, and more than 500,000 goals are scored.

The KNVB's member base includes 3,000 football clubs spread across the country. Thanks to this close-knit network of clubs, every resident of the Netherlands does not have to travel more than 1.6 kilometres on average to the nearest football pitch. No other sport is as deeply rooted in Dutch society as football.

Football is more than a game. A football club is an important place where children grow up and develop socially; where they learn to deal with winning and losing; where they collaborate with each other and learn to treat opponents and referees with respect.

In our society, football makes a contribution to health, education and connection in the Netherlands that cannot be expressed in money, at all levels of society, which makes our sport so unique. The benefits of football easily outweigh the costs. In addition to an economic investment in the region and a contribution to the GDP (€2.18 billion), football particularly promotes social cohesion, health and the development of Dutch society.



Artificial turf pitches of great importance for football in the Netherlands

Artificial turf pitches must be safe to play on, in terms of both sporting characteristics and environmental and health aspects. The SBR rubber granule infill of the Dutch artificial grass pitches must comply with all current statutory standards and guidelines. As far as the sporting characteristics are concerned, FIFA and NOC*NSF have drawn up widely supported guidelines. The sport monitors compliance with these guidelines.

The use of artificial grass pitches has become increasingly popular in Dutch recreational sports. In the Netherlands we have approx. 6,000 competition pitches, 2,320 of which are artificial turf pitches. More than a third of our football pitches are artificial turf pitches. Not every club has an artificial turf pitch, but the clubs in question do use the artificial turf fields as visiting parties. A direct ban, as proposed by ECHA, will therefore have far-reaching financial, organisational and social consequences in the Netherlands.

Clubs in the Netherlands generally opt for artificial turf pitches due to a lack of capacity, which is to say that our clubs often have no room to expand with natural grass pitches. In that case, an artificial turf pitch offers opportunities as a surface for intensive and multifunctional sports use, making these pitches essential to enable millions of Dutch people to play sports during the week and weekend. A ban on or possible postponement of the installation and maintenance of artificial grass pitches has an enormous impact on the organisation of recreational sports in the Netherlands and immediately far-reaching organisational and financial consequences.

The KNVB advises clubs that want to install artificial turf about the guidelines and statutory standards and, for the sake of the safety and health of the footballers, ensures that clubs comply with them.

Research into rubber granules in the Netherlands

In the Netherlands, the National Institute for Public Health and the Environment (RIVM) has carried out two investigations into rubber granules on synthetic turf pitches. The KNVB has complete confidence in the RIVM's expertise, which is why we always follow the advice of the published government research. The RIVM has carried out into rubber granules:

***1. Synthetic turf pitches with rubber granulate infill: are there health risks for people playing sports on such pitches?*¹**

The key results were that the National Institute for Public Health and the Environment (RIVM) has established that playing football on artificial turf pitches with rubber granule infill is responsible. The RIVM has found that there are many different substances in rubber granules, but that these are released from the granules in only very low quantities. The harmful effect on health is practically negligible.

***2. Leaching of zinc from rubber infill on artificial turf (football pitches)*²**

RIVM has carried out exploratory research into the environmental effects of rubber granules on artificial turf pitches. The RIVM analysed soil and water samples taken around sports fields with artificial grass and rubber granules. The analysis showed that the ditch water and groundwater in the natural subsoil were not contaminated by the rubber granules in the fields. The results of the exploratory study do, however, indicate that the use of rubber granules on artificial turf pitches may be harmful to the environment in the immediate vicinity of the pitch, but the RIVM still believes that it is not unhealthy to play sports on artificial turf with rubber granule infill.

¹ <https://www.rivm.nl/publicaties/evaluation-of-health-risks-of-playing-sports-on-synthetic-turf-pitches-with-rubber>

² <https://www.rivm.nl/publicaties/leaching-of-zinc-from-rubber-infill-on-artificial-turf-football-pitches>



Children playing and pets that accidentally ingest roadside soil are also not at risk. For environmental protection purposes, the RIVM has recommended a number of measures to prevent rubber granules from ending up on the roadside soil and substances from leaking into ditches via the drainage water.

Alternatives to SBR - artificial turf pitches

The growing popularity of artificial turf has prompted the VSG and the KNVB to actively pursue policy on all aspects related to artificial turf. In recent years, alternatives to rubber granules have been developed that contribute to a better turf and are more environmentally friendly. Some examples are granules of cork or synthetic rubber (TPE).

Artificial turf is under continuous development. The KNVB is in contact with representatives of government bodies (RIVM), municipalities (VSG) and synthetic turf manufacturers to discuss innovation and the synthetic turf pitches of the future. The popularity of artificial turf has prompted the KNVB to actively pursue a policy on all aspects related to artificial turf. A turf with the right playing characteristics goes hand in hand with the safety, environmental aspects and health of the footballers.

Call: first, thorough research into the effects of banning SBR granules

We ask the ECHA to consider the following:

- Please consider postponing a ban on SBR granules, because this will have far-reaching social, financial and sporting consequences in the Netherlands.
- We also call on ECHA to first carry out a thorough investigation within the EU into the social, economic and social consequences of a ban on SBR granules.
- The possibility of phasing out SBR granules should also be looked into. The abolition of all infill rubbers, including synthetic rubber, is not possible at the moment, because there are not enough good sustainable alternatives available in the market.
- In addition, we call on ECHA to explore transition possibilities around new fields and renovation of existing fields. Existing fields will eventually be replaced (after depreciation), so that the infill can be replaced naturally.
- We also call on ECHA to investigate alternative measures that prevent microplastics from spreading further in the environment.

On the basis of thorough research into the consequences of banning SBR granules, we can take any necessary follow-up steps together in a well-founded and targeted manner.

If you need further information, please contact us using the contact details below.

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