



EUROPEAN COMMISSION

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Consumer, Environmental and Health Technologies

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Head of Unit

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Subject: Request for clarification for document CA/30/2016 on rubber granules as infill material

Dear Ms Cinaralp,

Dear Mr Fletcher,

In response to your letter dated 26 September, in which you requested clarification regarding statements made by the Commission in document CA/30/2016¹ on the status of rubber infill material used in synthetic turf fields, allow us to clarify the following:

- As stated in the footnote to CA/30/2016, rubber granules used in synthetic sports pitches are considered to be mixtures. This interpretation was agreed at the previous CARACAL meeting between the Commission services and the majority of Member States.

¹ CA/30/2016. Interpretation of paragraph 5 of Entry 50 in Annex XVII to REACH (PAH restriction). 21st Meeting of Competent Authorities for REACH and CLP (CARACAL). 29 June – 1 July 2016

- In the view of the Commission services this applies to rubber granules, regardless of whether they are derived from ELT, that are supplied in bulk to be applied to a synthetic turf sports surface, or are already spread in such turf, as loosely contained infill granules. In such sports surfaces, the infill material remains a mixture, overlaying the synthetic turf carpet (which is an article).
- The sentence which you quote in your letter "*... the restriction in entry 50(5) covers ... synthetic turf used on artificial sports fields*" and which seems to be the cause of confusion, must be read in the context of the paragraph in which it appears and the preceding paragraph². The purpose of this statement was to clarify that the term "placing on the market for supply to the general public" covered making such articles available to the public (as well as the more obvious retail sale of such articles to the public). This is not to be understood as a statement from the Commission services that rubber granules used as infill in synthetic turf pitches is to be considered an article.

We hope this answers your concerns and clarifies the situation.

Yours sincerely,

(e-signed)

Klaus Berend

Head of Unit

DG for Internal Market,
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(e-signed)

Bjorn Hansen

Head of Unit

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² "According to the Commission, entry 50(5) of Annex XVII REACH that reads "Articles shall not be placed on the market for supply to the general public, if any . . ." should be interpreted in such a way that tiles/mats used in public playgrounds are supplied to the general public when they are put at the disposal of the general public. The same applies to synthetic turf used on artificial sports fields when they are put at the disposal of the general public, notwithstanding the type of ownership (public or private) or the specific type of transaction by which the objects were put at the disposal of the general public".