EUROPEAN TYRE & RUBBER manufacturers' association

Brussels, 29th of July 2021

ETRMA welcomes the restriction roadmap inclusion of a migration threshold on PAHs on Entry 50 paragraph 5 and 6 of Annex XVII of REACH and restriction of other substances in infill materials

ETRMA supports restricting the presence of any substances in infill materials that have been shown to pose an unacceptable risk to human health or the environment. ETRMA has also welcomed the publication of Regulation 2021/1199 on polycyclic-aromatic hydrocarbons (PAHs), as the limit of 20 mg/kg for PAH on granules used as infill has been demonstrated to be safe for users and players.

Rubber from vehicle tyres is a very high-quality material used as an infill. It replaces primary raw materials and contributes to a significant reduction of CO2 emissions. This form of recycling has been a front-runner in the circular economy of the European Union for many years and represents a significant portion of the recycling opportunities for End of Life Tyres[1]

When making decisions about resource management, also contributing to climate change, it is important to use all recent available scientific knowledge. The risk for users of infill material has been deeply assessed with the ERASSTRI study, concluding that the current levels of substances present in the most commonly used infill in Europe do not pose a risk to human health. This study has been independently published in peer reviewed scientific journals (Science of the Total Environment, March 2020)[2].

[1] https://www.etrma.org/wp-content/uploads/2021/05/20210520_ETRMA_PRESS-RELEASE_ELT-2019.pdf

[2] Part 1: Klaus Schneider, Manfred de Hoogd, Maria Pelle Madsen, Pascal Haxaire, Anne Bierwisch, Eva Kaiser, ERASSTRI - European Risk Assessment Study on Synthetic Turf Rubber Infill – Part 1: Analysis of infill samples, Science of The Total Environment, Volume 718, 2020, 137174, ISSN 0048-9697, https://doi.org/10.1016/j.scitotenv.2020.137174.

Part 2: Klaus Schneider, Manfred de Hoogd, Pascal Haxaire, Arne Philipps, Anne Bierwisch, Eva Kaiser, ERASSTRI - European Risk Assessment Study on Synthetic Turf Rubber Infill – Part 2: Migration and monitoring studies, Science of The Total Environment, Volume 718, 2020, 137173, ISSN 0048-9697, https://doi.org/10.1016/j.scitotenv.2020.137173. (http://www.sciencedirect.com/science/article/pii/S0048969720306835)

Part 3: Klaus Schneider, Anne Bierwisch, Eva Kaiser, ERASSTRI - European risk assessment study on synthetic turf rubber infill – Part 3: Exposure and risk characterisation, Science of The Total Environment, Volume 718, 2020, 137721, ISSN 0048-9697,https://doi.org/10.1016/j.scitotenv.2020.137721.
http://www.sciencedirect.com/science/article/pii/S0048969720312328)

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Migration threshold on PAHs on Entry 50 paragraph 5 and 6 of Annex XVII of REACH

Entry 50 paragraph 5 and 6 of Annex XV of REACH sets maximum thresholds of PAH content in weight for rubber and plastic products expected to be in contact with the skin under normal and foreseeable conditions of use. The maximum content in weight of any of the listed PAHs is set to 1 mg/kg for articles under the scope and 0,5 mg/kg for toys.

Rubber products under the scope of the restriction are for instance tools for domestic use, sportive cloth or footwear. It also includes tiles and carpets made of rubber granules that are placed in children's playgrounds or sport facilities.

ETRMA shares ECHA´s views, that there is sufficient new scientific information that assess PAH migration from rubber matrices to modify entry 50 paragraph 5 and 6 accordingly. The current conditions set in entry 50 paragraph 5 and 6 do not adequately take into account the exposure from PAH in rubber matrices. Substances present in rubber, like PAH, are firmly bounded to the rubber matrix, the fraction of PAH that migrates to skin is much lower than the content in weight.[3]

ETRMA is committed to support the announced restrictions and share our unique knowledge on rubber products and uses with the European Commission and the European Chemicals Agency.

The European Tyre & Rubber Manufacturers Association (ETRMA) represent nearly 4.400 companies in the EU, directly employing about 370.000 people. The global sales of ETRMA's corporate members represent 70% of total global sales and 7 out of 10 world leaders in the sector are ETRMA Members5. The product range of its members is extensive from tyres to pharmaceutical, baby care, construction and automotive rubber goods and many more applications. We have a strong manufacturing and research presence within the EU and candidate countries, with 93 tyre plants and 16 R&D centres.

ETRMA's membership: APOLLO VREDESTEIN, BRIDGESTONE EUROPE, BRISA, COOPER TIRES, CONTINENTAL, GOODYEAR, HANKOOK, MARANGONI, MICHELIN, NOKIAN TYRES, PIRELLI, PROMETEON, SUMITOMO RUBBER INDUSTRIES and TRELLEBORG WHEEL SYSTEMS. Furthermore, members include Associations in the following countries: Finland, France, Germany, Hungary, Italy, the Netherlands, Poland, Spain and the UK.

[3] Barrero, J., Senaldi, C., Bianchi, I., Geiss, O., Tirendi, S., Folgado De Lucena, A., Barahona Ruiz, F., Mainardi, G., Leva, P. and Aguar Fernandez, M., Migration of Polycyclic Aromatic Hydrocarbons (PAHs) from plastic and rubber articles, EUR 29282 EN, Publications Office of the European Union, Luxembourg, 2018, ISBN 978-92-79-89749-8 (online),978-92-79-89748-1 (print), doi:10.2760/41492 (online),10.2760/637211 (print), JRC111476.

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