



EUROPEAN COMMISSION

Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs
Consumer, Environmental and Health Technologies

Directorate-General for Environment
Green Economy

Directors

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NOTE FOR THE ATTENTION OF MR G. DANCET, EXECUTIVE DIRECTOR ECHA

Subject: Request to the European Chemicals Agency to cooperate with the Dutch authorities in the preparation of an Annex XV dossier to restrict the presence of Polycyclic Aromatic Hydrocarbons (PAHs) and to examine other relevant substances of concern to human health in plastic and rubber granulates used as infill in synthetic turf pitches

The Commission services have analysed ECHA's report "*An Evaluation of the Possible Health Risks of Recycled Rubber Granules Used as Infill in Synthetic Turf Sports Fields*" of 28 February 2017, prepared in reply to our request of 1 June 2016. In your report you identified a number of hazardous substances such as polycyclic aromatic hydrocarbons (PAHs), metals, phthalates, volatile and semi-volatile organic hydrocarbons (VOCs) that can be present in rubber granules.

The report concluded that, on one hand, the concentrations of PAHs in recycled rubber granules have so far normally been well below the limit values specified in entries 28 to 30 of Annex XVII to REACH, but on the other, that if the concentration of PAHs found in granules were to reach these limits, the level of concern would not be low. Furthermore, there were indications of some other concerns (e.g. due to VOCs in indoor halls) and uncertainties that needed further attention.

Given that on 30 June 2017, the Netherlands notified its intention to prepare a restriction dossier on the "*placing on the market of plastic and rubber granulates containing PAHs above a set concentration limit for use on synthetic turf pitches*", we request you to cooperate with the Netherlands in the preparation of the Annex XV report.

We are convinced that the knowledge already acquired by ECHA on this matter as well as your expertise in Annex XV dossier preparation will contribute to the successful and timely completion of this dossier. While the work, as defined in the Dutch notification, will focus on PAHs, we would also like ECHA to assess all other potential risks to human health arising from the presence of hazardous substances found in rubber granules used in synthetic sports fields.



To the extent possible, and pending subsequent discussions with the Commission and the Dutch authorities, any risks to human health from any other relevant substances than PAHs should be included in the on-going Annex XV dossier. If such inclusion is not possible due to time constraints imposed by the submission of the PAH dossier, the need to address possible risks related to other substances than PAHs should be covered in a separate restriction dossier to be developed by ECHA, if possible also in co-operation with the Netherlands.

Please plan the content and the timing of the work related to PAHs with the Dutch authorities and agree with them how the relevant international and regional activities in this area, such as research on recycled tyre crumb in the US, are to be considered.

Should the result of your investigations indicate that substances other than PAHs in rubber granules used in synthetic sports fields warrant an EU-wide restriction, please inform us about this at your earliest convenience including the timing when you would make the notification to the Registry of Intentions.

Please note that assessing possible environmental risks of hazardous substances present in plastic and rubber granulates used on synthetic turf pitches might be considered at a later stage on the basis of the review of additional information on concerns regarding hazardous substances in the infill material that will be performed in collaboration with RIVM during the drafting process of the annex XV dossier.

Yours sincerely,

(e-signed)

Carlo Pettinelli
DG Internal Market, Industry,
Entrepreneurship and SMEs

(e-signed)

Kestutis Sadauskas
DG Environment