



To
Committee for Socio-Economic Analysis,
ECHA
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Kalle Kivelä, Deputy Chair of SEAC
Bjorn Hansen, Executive Director of ECHA

Stockholm, the 1st of September, 2020

Public consultation on micro plastics

Following the public consultation on microplastics from the Committee for Socio-Economic Analysis (SEAC), ECHA, the Nordic football associations is providing the following joint response regarding the possible ban of rubber granulate as performance infill on artificial football turf.

For several hundreds of thousands of young and old Nordic football players, artificial pitches have become a vital everyday necessity to be able to play football all year. With several thousand active pitches spread across the Nordic countries, the health and social impact is tremendous. This vital infrastructure is a concern for all the Nordic football associations representing a total of 1 200 000 registered football players.

We have previously made national comments and positions available via UEFA and stand by the arguments made by UEFA to ECHA but feel a sense of urgency to further emphasize the climatic conditions and the effect of a possible ban on everyday football in the Nordic countries.

The Nordic weather conditions require a large number of artificial turf pitches, primarily to be able to play football during the winter months, and rubber granules are currently the only performance infill that can endure the rough Nordic climate. Alternative infills like cork, bark and sand do not live up to the required football functionality. These infills can absorb water that can result in non-functional pitches.

We see a widespread market push towards a replacement of the well proven granulate pitch toward non-performance infill pitches. This is a stepping-stone but is not sufficiently relevant for football clubs. These non-infill pitches have been proven to be too hard and slippery for players and can cause additional injuries. Furthermore, non-performance infill football pitches are short-lived due to the carpet surface, which cracks more easily and needs to be changed more often.

The Nordic football associations work intensively and strategically with the operation and maintenance of artificial turfs and train operating personnel, football players and managers and invest in minimizing migration of granules to surrounding surfaces for example, focus on granules on snow covered football field, as well as panels around the sides of the pitch, shoe brushing stations, granular traps and water filters. A ban on microplastics would mean that fewer people would be able to play football in the Nordic countries. As an example – up to ten natural grass pitches would have to be established for the termination of one artificial turf pitch to cope with the needed for playing hours. We can already see that this is impossible especially in our major cities and urban areas. It is also a fact that present alternatives without infill is significant more expensive.



Our preferred legal option is to limit the migration of granules from the football pitch. There are already several sustainable and innovative market-based solutions, which already have been proven relevant and that can be applicable for all pitches in Europe. We offer our support and assistance to develop and implement environmental solutions that guarantees the possibility for all Nordic and European football players to be able to play football all year long in all kinds of weather. At the same time, we work actively to get more environmentally friendly artificial turf solutions developed and are constantly testing new products that are launched. Unfortunately, it seems that for developing good enough solutions there is still some way to go.

Thus, the Nordic football associations strongly urge ECHA not to recommend a total ban on the use of granulate infill and propose to further improve the physical barriers and behavioural design to prevent migration of granulate to the natural environment.

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