



## Microplastic infill in sport pitches

### NGO additional comments on the Commission's proposal

15 Nov 2022 - The European Environmental Bureau & ClientEarth

As part of its proposal to restrict all intentionally-added microplastics, **the European Commission is considering a ban on synthetic polymer infill materials in artificial sport pitches**. The ban would enter into force **after a six-year transitional period**.

Sport pitches are the largest contributor at EU level in terms of quantities of intentionally added microplastics both used and released to the environment,<sup>1</sup> with potential toxic chemical leaching.<sup>2</sup> Yet, they continue to be built year on year.<sup>3</sup>

To remedy the pollution associated with the use of microplastics in sport pitches, the initial ECHA proposal included either a ban on the use of microplastics as infill, or risk-management measures to prevent the loss of microplastics from sport fields.<sup>4</sup> **We concur with the Commission that a ban is by far the best instrument to reach the EU ambition, as supported by the following considerations:**

→ **Alternative - safer - solutions are available**, including organic infill materials<sup>5</sup> and solutions without any infill.<sup>6</sup>

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<sup>1</sup> RAC Opinion, dated 11 June 2020, p.55. For more information on the environmental impact of artificial pitches, see: [Plastic Pitches - Fidra](#)

<sup>2</sup> [Release of particles, organic compounds, and metals from crumb rubber used in synthetic turf under chemical and physical stress | SpringerLink](#)

<sup>3</sup> Eunomia Research & Consulting (2018) Investigating options for reducing releases in the aquatic environment emitted by (but not intentionally added in) products. *Report for DG Environment of the European Commission*:

[http://ec.europa.eu/environment/marine/good-environmental-status/descriptor-10/pdf/microplastics\\_final\\_report\\_v5\\_full.pdf](http://ec.europa.eu/environment/marine/good-environmental-status/descriptor-10/pdf/microplastics_final_report_v5_full.pdf)

<sup>4</sup> ECHA Annex XV Report: [Microsoft Word - rest\\_microplastics\\_axvreport\\_en.docx \(europa.eu\)](#)

<sup>5</sup> A list of alternatives on the market can be found at:

<https://www.fidra.org.uk/artificial-pitches/plastic-pitches/solutions/#infills>. See also for example, the FIFA certified cork infill: <https://domosportsgrass.com/en/performance-infill/domo-naturafill> and FIFA certified organic infills and examples of sport pitches:

[https://www.realsport.fr/sites/default/files/2021-05/RS\\_FT\\_Purefill%20-F\\_web\\_%202020%2013.05.2021.pdf](https://www.realsport.fr/sites/default/files/2021-05/RS_FT_Purefill%20-F_web_%202020%2013.05.2021.pdf), <https://www.mediterranee-environnement.fr/blog/rea/stade-bouissou/>

<sup>6</sup> [original\\_DFB-Recommendations-Microplastic\\_2022.pdf](#)



being renovated, stimulating changes as soon as possible and thus also avoiding new investments in synthetic polymer infill. Most pitches should be renovated during the proposed transition time of six years.

- **Other instruments are implemented in support of the ban**, such as EPR/ take-back obligations, certifications and financial support connected to the transition to alternative infill and related-investments.<sup>18</sup>

The infill, the turf and the shockpad form a system that must be well designed from design to disposal - hence any solution to the microplastics pollution stemming from that source should take into account waste management practices, including best recycling solutions for tires and adequate waste handling of hazardous materials.<sup>19</sup> Banning microplastic infill in sport pitches is therefore no silver bullet but it is still a mandatory first step.

## Useful links and documentation

[KG2021 documentation/ files from NTNU i Norway](#)

[Alternative Infill cases, by FIDRA](#)

[Guidance for cleaner Pitches by FIDRA and KIMO](#)

German Football Association DFB, [Microplastic Discharge from Existing Synthetic Turf Pitches](#)

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<sup>18</sup> City of Hamburg, procurement guideline synthetic turf

<sup>19</sup> SIAT NTNU Project KG2021 2022 (in process)