

Visit xxx and Meeting RIVM

Report for the purpose of developing the restriction dossier – xx (RIVM), xx (RIVM), xx (RIVM)

Visit xx 11 October 2017 10.00-13:00h

Attendees

xxx (sales and marketing manager xx), xx (Advisor xx), xx (consultant, xx), xx (RIVM), xx (RIVM), xx (RIVM), xx (RIVM), xx (ECHA)

Introduction

We are welcomed by xx and start with a tour the table to introduce ourselves. xx gives an introduction in the company and we discuss the range of products that is shown to us in the meeting room. Visit included a meeting and tour on the xx factory inside and outside storage and tire selection facilities.

The company

xx started 25 years ago. They are involved in whole process, from collecting ELT to selling the products. [redacted] car tires per day, i.e. [redacted] in [redacted]. The company has one other site in [redacted]. Company is located next to [redacted]. Transport by lorry and ship. Company manufactures for consumer market (infill is 25% of revenue) and industrial market (>75% of revenue). Consumer products are two: (1) granules used as infill and (2) various types of tiles sold in DIY stores. Tiles are made from the exact same granules than the infill material. Tiles are manufactured on the site by mixing the granules with glue. The paste is hot-pressed in molds resulting in tiles that are cooled and packaged. Tiles are sold in 4 colours. Pigment is in the glue not in the granules. No coated tiles are produced by xx but coated tiles and flooring is available on the market. Coating is normally done with 4-5 mm of EPDM which gives higher price (10 times) but advantages in colour range (bright colours) and reduced heat and smell. EPDM is used due to comparable characteristics as SBR. xx manufactures 4 categories of sieved material (granules) for various applications. xx also manufactures PU-coated granules for regional market. PU-coating adds nice green colour, reduces odour and heat development in summer. Mandatory for example in Italy (by football organization). Maximally 5% of their granules sales are PU-coated. xx does not manufacture granules under cryogenic conditions. xx cooperates with Canadian/French institutions to investigate options for devulcanising rubber which is seen as a holy grail.

xx has a much larger industrial product range. Many of these are materials or articles used in infrastructure but also industrial flooring. Not all are used in NL.

xx sells to regional market. Transport costs are limiting factor. E.g. as transport costs for a truck to Italy are around EURO 1.500, this will not compete with IT manufacturers. Hence, xx sells to NL (95% of their infill is for Dutch market), BE, DE region (roughly).

Tire selection, feedstock

Xx handles car tires only. Administration of tires is strictly regulated in NL by RECYBEM and other organizations. This is due to the producer responsibility system. E.g. car workshop enlisted by RECYBEM is allowed to supply old tires, others are not. All tires are manually inspected. Criterion: are they collected on the Dutch market or not. First step is that reusable tires are sorted out for shipment outside EU (i.e. to African region) for second hand use of tires. Second step is that the older tires (before 2010) are deselected for manufacture of their consumer products because of the expected high(er) PAHs concentrations prior to the extender oil restriction. All deselected tires may

be used for industrial product range manufacture purposes. No Off the Road, no truck tires, no other rubber materials are used as feedstock.

Tonnages, turnover market development

Market changed tremendously last year due to NL rumour caused by Zembla, 40% reduction in turnover of granules. Last year (2016) turnover was [REDACTED], 2017 around [REDACTED], 2018 expected around [REDACTED]. Xx confirms that NL use of artificial turf pitches is relatively large compared to other countries. In NL infrastructural space is limited and clubs want and need to use pitches as efficiently as possible. Artificial turf can be use much more intense than natural grass. Export is growing slightly. Artificial turf is coming up in France, UK and Scandinavian countries. It is used a lot in Iceland. In Germany most infill is TPE, not many SBR pitches.

Cryogenic is not done by Xx. Price of their granulates is [REDACTED], whilst cryogenic is sold [REDACTED]. Xx makes <0.8 mm granules through sieving. June-sept is their selling time because in summer breaks pitches are made and maintained. (price for turf is [REDACTED]). When selling the granules, Xx provides information on the origins (herkomst) material and the PAHs content of that batch (i.e. each package has the information of the year and week, when the material was produced and package number).

Price of EPDM is 10 times higher than price of SBR.

Xx states that in the NL the Ministry of IenM has provided a product status to granules – thus not being a waste anymore. RIVM will confirm this statement with the Ministry.

PAH levels, sampling and measurements

Xx wants to stay below the 20 mg/kg PAH8 based on MilieuKeur/RECYBEM criteria. History of measurements started a few years ago. Since February this year testing is done on a weekly basis. Analysis will be made available to us. Samples are taken weekly. SGS in DE does the analysis on the granules. PAH SUM is currently around 11 mg/kg so easily compliant with 20 m/kg and legal value for mixtures of 1000 mg/kg. Individual PAHs levels above 1 (limit value for articles based on REACH Annex XVII entry 50) is at the borderline or just above. BaP is problem. The company considers the situation around articles as “uncertain” since they see that MS have different opinions on whether the tiles they manufacture are in the scope of REACH Annex XVII entry 50. So they are eagerly waiting for clarity and currently supply the tiles whilst getting away from this discussion. They contest the tiles being in the scope of the articles targeted by entry 50. ECHA is working on guideline that will be discussed in CARACAL in November.

Besides PAHs also other compounds (like benzene, toluene, metals, and phthalates) are measured (not on regular basis). We will receive this information.

Health research

ETRMA are doing research with Fobig on health risks. Sampling throughout EU. Sampling and analysis on pitches and in products on site. PAH information will be reported in December 2018. Other information will be published later. We are aware and in contact with ETRMA.

Service life and abatement of pitches

Service-life of pitches is 10-15 years. (15 year old artificial pitches with SBR turf still fulfill the FIFA requirement). What is happening with replenished material? Material that are taken of the fields after 10-15 years, may be even re-used again as infill but Xx does not now details as they are not involved. Granules are not returned to them. There are companies specialized in removing the old fields (Rematch e.g.). Lifetime of alternative infill can differ a lot. Lifetime of SBR can be longer than 10-15 years of the pitches. Alternatives might have a shorter lifetime than the pitches.