

## Recommendation as a means of control<sup>1</sup>

### Executive Summary

In July 2006, The Swedish Chemicals Agency (Kemikalieinspektionen, KemI) issued a recommendation<sup>2</sup> on the usage of rubber granules from recycled tyres as filling material (between the straws) in synthetic turfs, mainly for outdoor football courts. In brief, the recommendation<sup>3</sup> aims at creating a behavioural change in buyers – avoiding rubber granules from recycled tyres when laying artificial turf on sports pitches since recycled tyres contain several substances hazardous to health and environment – through addressing target groups such as local authorities (kommuner) and football associations planning for or laying artificial turfs, as well as retailers, laying firms and producers of artificial turf. The recommendation is accompanied by a report made by KemI presenting available data and research made on the subject in order to inform and simplify transformation on turf-choice behaviour.

Faugert & Co Utvärdering AB has during September 2007, shortly over a year after the issue of the recommendation, evaluated the reception and the impact of the recommendation. The evaluation was commissioned by KemI. Our contact person at KemI has been Christina Rudin Snöbohm.

Initially, five interviews were conducted with representatives from five actor-groups for screening purposes, local authorities, public and political sectors, football associations and retailers, a total of five interviews. Following that, information for the evaluation was primarily collected through surveys. In total, 359 questionnaires were sent out to local authorities (kommuner 291 ex), regional football organisations (Svenska

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<sup>1</sup> From the report "Synthetic turf from a chemical perspective – a status report", The Swedish Chemicals Agency, september 2007, KemI PM 3/06.

<sup>2</sup> A recommendation of this kind is a way of clarifying and assisting actors in their choice of materials and is supposed to act as a "soft" way of enforcing the prevailing environment legislation and set environment goals.

<sup>3</sup> Extracted text from the recommendation:

"Tyres contain several Substances of Very High Concern (SVHC) with particularly hazardous properties such as causing cancer, disrupting reproduction or adversely affecting genetic material. Examples are polycyclic aromatic hydrocarbons (PAHs), phthalates and certain metals."

"Studies show that the local environment may be affected if certain hazardous substances, such as zinc and phenols, leach from the rubber granules and enter rivers and streams, where they may affect organisms."

"It is the responsibility of companies to make sure that the artificial turf they sell is safe for humans and the environment. KemI urges anyone intending to lay artificial turf to request information about its chemical content and to stipulate requirements when buying so that substances of very high concern (SVHC) can be avoided. Swedish companies, for their part, should demand that their suppliers push ahead with the development of better alternatives."

fotbollsförbundets distrikt 24 ex) and local football clubs (lokala fotbollsöreningar 44 ex). 22 of the responses from local authorities' represent environment and health departments. In addition, ten interviews were conducted with retailers of artificial turf.

The main issues of the evaluation were:

- *To what extent are the parties aware of the recommendation and its purpose?*
- *Which consequences (impact) has the recommendation lead to?*
- *How is a recommendation of this kind received?*

*To what extent are the parties aware of the recommendation and its purpose?*

The evaluation found that quite a large number of the informants were aware of the recommendation and its purpose, all the suppliers, 67% of the football districts and 58% of the local authorities. Only the football clubs were showing a different result, whereas only 26% of the respondents admitted they were aware of the existence of the recommendation.

This response distribution appears logical and illuminates the different actors' focal points and interests. For example, KemI primarily addressed the departments of environment and health at the local authorities, and the survey was primarily addressed, through the registrars, to the department believed to be the most knowledgeable on issues regarding artificial turf, which then mainly turned out to be the department of sports and leisure. This may be a sign of failing communication procedures between the departments within the local authorities, as answers from departments other than environment and health showed less awareness of and willingness to comply with the recommendation.

*What impact did the recommendation achieve?*

The information we collected showed a change in behaviour, to some extent. An increased level of awareness resulted in change of action, for example, a proven decrease in demand for rubber granules from recycled tyres. The results show that 91% of the football courts with artificial turf laid before the recommendation contained granules from recycled tyres, whereas only 40 % of the football courts laid after the recommendation contained that same material, in spite of a total increase in the number of football courts laid. Instead alternative materials are used, such as other forms of rubber granules, plastic granules and sand.

Quite a few of the respondents express doubts about the alternative materials offered on the market, since their durability, sustainability and playability as compared to other materials are not known.

However, the point must be made that change in behaviour is most likely the result of many aspects – whereof the recommendation is one – in combination with the media debate and the general level of increased awareness of the importance of strategic choices to ensure a sustainable development.

Suppliers claim that the recommendation led to behavioural changes amongst them as well as amongst buyers, though to a varying degree. Some pointed to the fact that some buyers, right at the time when the recommendation was issued, altered their filling material plans. Some of them also say that if it had not been for the recommendation, granules from recycled tires would still be the primary choice amongst buyers.

The data indicate two impediments for the complete success of the recommendation:

- The report's and the recommendation's lack of focus on the consequences of the use of alternative materials, leaving too much up to the buyer on choosing more advantageous materials.
- Actor's various expectations, interests and motives regarding financial aspects (costs) as well as durability, sustainability and playability related traits of the filling materials chosen.

#### *How is a recommendation of this kind received?*

Most respondents reacted positively to the recommendation and perceived it as a support in working with planning of artificial turf football courts. However, quite a few were of the opinion that the issue of the recommendation might have been a little too hasty, that the reaction stood out of proportion. The KemI report is not perceived to include the facts needed to completely support compliance to the recommendation, which complicates. The producers and suppliers expressed frustration with not having been offered the length of time needed to bring forth a granule material as durable, playable and financially advantageous (cheap) as the granules from recycled tyres appeared to be.

#### *Comments*

Issues of chemical nature are complicated by the fact that we know little about the impacts of quite a great number of chemical substances – as well as chemical qualities of many products on the market. This common lack of knowledge and awareness often accompanying chemical issues is showing clearly in the material collected for the evaluation, both in the facts underpinning the recommendation as well as in the interpretations of the recommendation made by actors, showing in their comments.

Suppliers are a major node in this system, an important target group for the recommendation since they are responsible for the effects of their products and the accompanying information which they distribute. To what extent they have really taken this responsibility in the case of artificial turf can be debatable.

The evaluation also shows the potential conflict of interest that affects the local authorities, as departments are representing different aspects of the usage of football courts. For example, sports and leisure departments may be more interested in usage and playability of the foot ball court, park and street departments may be more interested in durability and maintenance aspects of the materials chosen, and the environment department is likely most interested in sustainability for man and nature in the long run. For the recommendation to have the desired impact on the decision making process in the local authorities, this needs to be taken into account.

Important to remember is that KemI acts in contexts where other drive forces are also affecting the possible outcomes of a recommendation like this. KemI is an actor amongst others, whose actions and results are affected by contexts. The impact of this recommendation has to be viewed with regard to contextual aspects and actions of others – such as media, FIFA or those mentioned above – in order to fully understand recommendation compliance levels.