

February 19, 2020

STATEMENT OF  
THE TIRE INDUSTRY ASSOCIATION  
IN OPPOSITION TO H.B. 1547  
BEFORE THE  
MARYLAND HOUSE ECONOMIC MATTERS COMMITTEE  
FEBRUARY 19, 2020  
ANNAPOLIS, MARYLAND

Dear Chairman Davis and members of the Economic Matters Committee, I respectfully submit this statement on behalf of over 300 Maryland businesses that are members of the Tire Industry Association (TIA).

The Tire Industry Association is an international non-profit association representing all segments of the tire industry, including those that manufacture, repair, recycle, sell, service or use new or retreaded tires, and also those suppliers or individuals who furnish equipment, material or services to the industry.

The mission of TIA is to promote tire safety through training and education, to act as the principal advocate in government affairs and to enhance the image and professionalism of the industry so that our member businesses may be more successful. TIA has more than 13,000 members from all 50 states and around the globe. As the industry leader in tire service technician training, TIA has educated more than 160,000 people since 1997.

Thank you for the opportunity to submit testimony in opposition of House Bill 1547, an act concerning producer responsibility for synthetic turf and turf infill. By mandating that manufacturers of individual components of a synthetic turf field system are responsible for the end-of-life management of fields, TIA believes that this legislation will limit the recyclability of synthetic turf and infill, not encourage it, by:

- Taking control over end-of-life management and options from field owners;
- Taking control over the flow and management of recyclable materials from recyclers;
- Stifling innovation and new entries into the market for reusing and recycling components;
- Applying a management model designed for individual products on a synthetic turf field system made of multiple different component products; and
- Driving manufacturers out of the market for violations.



Maryland Office:  
1532 Pointer Ridge Place 800.876.8372  
Suite G 301.430.7280  
Bowie, Maryland 301.430.7283 f  
20716-1883

Each year, approximately 110 million tires are processed in the United States by the recycling industry – or one tire for every three people in the U.S. In the past, scrap tires — generated when an old, worn tire is replaced with a new tire — were often dumped illegally in lakes, abandoned lots, along the side of the road and in sensitive habitats. Today, scrap tires are playing a much different role as an important part of the manufacturing process as well as providing environmentally responsible solutions to age-old problems.

Over the past few decades, tire recyclers have invested millions of dollars in technologies and equipment to recycle tires, allowing scrap tires to play an important role in strengthening our economy and protecting our environment. Thanks to these innovations in manufacturing, recycled rubber is now a common alternative used, for example, to facilitate softer playground surfaces, reduce the chance of injuries for athletes, and provide softer lower-impact surfaces for those on their feet hard at work and play.

Recycled rubber is a highly sought material in the manufacturing industry. Scrap processors produce more than 1 billion pounds of crumb rubber annually that is used in the creation of new products ranging from landscaping tools, playground covering, and infill for athletic playing surfaces used by pro-athletes, colleges/universities, high schools, and communities, as well as long-term, high-traffic items such as roadways, sidewalks and horse tracks. Applications for recycled rubber — such as rubberized asphalt and crumb rubber — have become recognized for their preferable properties and are gaining in prominence and widespread use.

Desires to increase the reuse and recycling of synthetic turf and turf infill should be addressed through market development strategies, not mandates placing control of the existing recycling and reuse infrastructure and markets in the hands of producers. Instead, policy can be developed to incentivize reuse and recycling over other end-of-life management options.

In conclusion, TIA believes Maryland HB 1547 would harm the recyclability of synthetic turf and synthetic turf infill. By mandating that manufacturers of individual components of a synthetic turf field system are responsible for the end-of-life management of fields, TIA believes that this legislation will take power over end-of-life management decisions from field owners and limit the recyclability of synthetic turf and infill, not encourage it.

Because of this, and on behalf of TIA members in the state of Maryland working to improve our environment and economy by keeping valuable recyclable materials out of landfills, I urge this distinguished committee to oppose this legislation.

Sincerely,

Roy Littlefield  
Director of Government Affairs  
Tire Industry Association



Maryland Office:  
1532 Pointer Ridge Place 800.876.8372  
Suite G 301.430.7280  
Bowie, Maryland 301.430.7283 f  
20716-1883