



RECYCLED
RUBBER COALITION

March 22, 2023

Maryland General Assembly
Education, Energy, and the Environmental Committee
Senate Office Building
Annapolis, MD 21401

Dear Chair Feldman, Vice Chair Kagan, and members of the Education, Energy, and the Environmental Committee,

My name is Stratton Kirton and on behalf of the Recycled Rubber Coalition (RRC), I am here today in opposition to House Bill 299.

By way of background, the Recycled Rubber Coalition is a national organization representing rubber recyclers and companies that use recycled rubber. Our coalition is a resource for policymakers and the public on the responsible and safe uses of recycled rubber. Additionally, we work with state and local policymakers to discuss ways we can increase the reuse and recycling of rubber tires.

The Recycled Rubber Coalition and the entire rubber recycling industry have made great strides promoting the reuse and recycling of rubber materials—and one of the materials rubber is frequently recycled into is synthetic turf. As an industry whose primary function is ensuring reuse, the recycled rubber industry greatly supports the synthetic turf industry's longstanding commitment to promoting the responsible reuse and recycling of turf fields.

Our primary change to the bill would be to increase the minimum square footage threshold to 50,000 sq ft. If the intention of the legislation is to capture what reasonable people would recognize as a sports field, increasing the square footage minimum would do so, while not subjecting non-sports fields to these regulations. By using the Sierra Club's own list of synthetic turf fields in Maryland from 2022, a 50,000 square foot minimum would capture 75% of the instances of synthetic turf they documented.

For reference, the playground near the house where my son grew up—which is modest in size—measures at 9,000 square feet, so well above the threshold as passed by the House of Delegates, even though it is most decidedly not a sports field.

Additionally, from a recycling perspective, we have concerns that the bill as written would subject owners of modestly sized secondary-use turf to the reporting requirements and fines set forth in this legislation, which could potentially lead many to decide against re-use of turf and lead to more turf in landfills, which I think we can all agree is what we are trying to avoid.

We cannot support the bill as it is currently drafted, but with this bill and future relevant legislation, we would love to work with any members on policy recommendations that continue to improve tire recycling in Maryland, as we recently outlined in [our white paper](#).

Thank you for your consideration,
Stratton Kirton
The Recycled Rubber Coalition