

Response to House Bill 299
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Among the greatest values of our Legislative system is public input permitting a wide range of views to be taken into consideration as a bill is considered. Thank you for the opportunity to comment on House Bill 299 Environment – Synthetic Turf – Chain of Custody

I have read the proposed bill and am opposed to the bill in its current form and offer the following in support of my opposition:

Definitions:

“Custodian” – a person or **entity**...

“Producer” – a person or **entity**... that supplies turf that is installed within the State.

Turf is produced by numerous suppliers and tufting is but one element of construction, backings and coatings too are essential elements of a turf system. The proposed definition of producer fails to address the various elements of turf. The proposed reference to license or trademark brings no value to the proposed bill. Imports present greater challenges for compliance and enforcement than domestic firms.

“Synthetic Turf” – the majority of but not all synthetic turf products are “tufted”

Not all synthetic turf is used in landscape including installations of over 5000 sq.ft. Carpeting has many of the same attributes as synthetic turf and is not addressed in HB299. Carpeting may be tufted, has backing systems, coatings and may be installed both indoors and outdoors.

“Turf Infill” – the definitions are missing. Infill is typically the largest single component of a synthetic turf system and may contain various components including synthetic and naturally occurring components to provide playability, impact attenuation and ballast. Infills are thoroughly evaluated, tested and installed within a turf system to provide appropriate characteristics for the particular playing surface based on the use of that surface.

9-2502 Notice by the “Custodian”

The reporting requirements include reasonable data including:

Name and address of the Owner

Geographical address of the location of the turf

The area of the Synthetic turf

The value of brand and installer and suggest the weight requirement is ambiguous and vague. Is it the face weight, infill component weight, shipping weight?... It is onerous for an owner to be expected to gather this information and does not consider subsequent additions of infill that may be required and serves little purpose.

When replacing turf numerous expanding avenues are becoming more widely available including repurposing, recycling, and disposal in landfills. End of Life of product has been a high priority for industry members and the rapidly development of solutions include better methods of turf removal, better packaging and transportation options, greater recycling and finding alternate means to separate product into useful components for use again into a synthetic system or as raw material into other products.

The concept of Chain of Custody is not by itself a concern but legislation without a thorough understanding and balance of needs would lead to a bill that would serve both the public and not be a burden to producers and owners of synthetic fields that provide opportunities for not only recreation but for storm water management that are difficult with natural grass systems. Synthetic turf requires neither fertilization nor pesticides and maintenance is generally a grooming process that distributes infill evenly.

I ask that before House Bill 299 moves ahead that consideration be given to discussing options and opportunities with industry groups such as the Synthetic Turf Council. I too offer to sit with legislative or technical representatives to assist meeting the goal of Chain of Custody without burdening owners, producers, installers or recyclers unnecessarily.