

HB 457 - SUPPORT

Amanda Farber
amandafarber@hotmail.com

240-271-9033

HB 457 SUPPORT - Environment – Synthetic Turf and Turf Infill – Chain of Custody

Hearing: Feb 16th, 2024

Dear Chair Korman, Vice Chair Boyce, and Members of the Environment and Transportation Committee:

I strongly support HB 457 which would require the Department of the Environment to establish a system to track the chain of custody of synthetic turf installed on sports and playing fields in the State; require the custodian of a synthetic turf sports or playing field installed in the State to report chain of custody information to the Department on or before January 1, 2025, or within 30 days after the completion of the installation, whichever is later, and impose an administrative penalty for violations.

This bill is about transparency and best practices; it is neither punitive nor prohibitive.

All synthetic turf fields have limited lifespans and require regular replacement at least every 8-10 years. Some organizations and jurisdictions have fields that have required more frequent replacement. Between the large number of synthetic turf fields that must be removed every year, the petrochemical based plastic carpet, the shock pad, and the infill component of each field (consisting of silica sand, tire crumb and/or other infills), this represents a massive amount of material which must be managed. In fact, the industry has characterized the amount of material to be handled as “enormous,” and has acknowledged that synthetic turf components have not always been handled or disposed of responsibly. This bill requires a simple, straightforward reporting of the chain of custody of the materials involved.

The Synthetic Turf Council guidelines themselves recommend chain of custody documentation.

https://cdn.ymaws.com/www.syntheticurfCouncil.org/resource/resmgr/guidelines/STC_Guideline_for_Recycle_Re.pdf

The Synthetic Turf Council (STC), the “world’s largest organization representing the synthetic turf industry,” released their latest version of their *Guideline to Recycle, Reuse, Repurpose and Remove Synthetic Turf Systems* in 2017. The guidelines include recommendations and multiple examples of chain-of-custody, but there is little in the way of required accountability.

The industry has often used vague or greenwashed language with regards to disposal and recycling. For example, just because an item is theoretically “recyclable” does not mean it is practical to do so. In addition, the term “recycling” is often used when in fact companies are referring to “reusing” or “repurposing.” We do know there are currently no complete circular synthetic turf recycling facilities in the United States at this time. Synthetic turf can be re-used, landfilled, incinerated, dumped, or stockpiled. Again, this is why chain of custody is critical.

Basic reporting is an opportunity for the industry to be good stewards of their product and the environment.

https://football-technology.fifa.com/media/1230/artificial_turf_recycling.pdf

FIFA, the international governing body for football (soccer) commissioned an Environmental Impact Study of Artificial Football Turf dated March 2017.

The report raises the issue of disposal cost and transparency, stating, “there may be a significant issue with the illegal dumping of waste pitches and this issue will only worsen as an increasing number of pitches will need to be disposed of in the coming years.” The report also warns, “IMPORTANT! Always ask for proof of where the turf is being sent. Illegal dumping is the worst possible end for your pitch!”

A number of news outlets have recently covered the growing issues surrounding the end-of-life disposal of artificial turf - and need for additional transparency and accountability:

- The Philadelphia Inquirer – ‘Forever Fields:’ How Pennsylvania Became a Dumping Ground for Discarded Artificial Turf; December 13, 2023 <https://www.inquirer.com/news/pennsylvania/artificial-turf-pfas-rematch-pennsylvania-dumping-ground-20231213.html>
- The Atlantic - *Fields of Waste: Artificial Turf Is Piling Up With No Recycling Fix*; December 19, 2019 <https://www.theatlantic.com/science/archive/2019/12/artificial-turf-fields-are-piling-no-recycling-fix/603874/>
- York Daily Record / USA Today - *Worn Out Artificial Turf Fields Pose Huge Waste Problem Across Nation*; November 18, 2019 <https://www.ydr.com/in-depth/news/2019/11/18/old-artificial-turf-fields-pose-huge-waste-problem-environmental-concerns-across-nation/2314353001/>
- Seattle Times - *Feds Order Owner of Dam on Puyallup River to Clean Up Spill From Artificial Turf*; September 3, 2020 <https://www.seattletimes.com/seattle-news/environment/feds-order-owner-of-dam-on-puyallup-river-to-clean-up-spill-from-artificial-turf/>
- Zembla - *The Artificial Turf Mountain*; September 20, 2018 <https://www.bnnvara.nl/zembla/artikelen/the-artificial-turf-mountain>
- Maryland Matters – *Legislation Seeks More Environmentally Friendly Turf Removal*; February 20, 2020 <https://www.marylandmatters.org/2020/02/20/proposed-legislation-could-see-more-environmentally-friendly-turf-removal/>

It should not be difficult for stakeholders to obtain basic verifiable information regarding chain of custody of synthetic turf material and turf infill – but it is. HB 457 will help ensure greater accountability in the handling of the material without an undue burden on the industry.

Thank you,

Amanda Farber

Resident District 18



The Philadelphia Inquirer

Over 6,000 rolls of artificial turf sit on B.D. Hill Side Farm in Nicholson, Pa., on Thursday, Oct. 26, 2023. Re-Match, a Danish recycling company, allegedly told the farm owner it would pay ... [Read more](#)
Monica Herndon / Staff Photographer



Rolls upon rolls of artificial turf were dumped on farmland owned by Jim Halkias in Grantville, Dauphin County, Pa. Re-Match, a Denmark-based recycling company, had initially paid Halkias \$4 ... [Read more](#)
Jessica Griffin / Staff Photographer