February 24, 2021

Maryland General Assembly
Environment and Transportation Committee
House Office Building
Room 251
Annapolis, MD 21401

Written Testimony in opposition of House Bill No. 857:

Submitted by:
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Dear Chair Barve, Vice Chair Stein and members of the Environment and Transportation Committee:

My name is Dan Bond and on behalf of the Synthetic Turf Council (STC), I am writing in opposition to House Bill No. 857. The STC is headquartered in Forest Hill, MD and is the world's largest organization representing the synthetic turf industry. Founded in 2003, the STC represents over 245 members and promotes industry excellence through guidelines, certifications, and other learning platforms. Membership includes builders, landscape architects, testing labs, maintenance providers, manufacturers, suppliers, installation contractors, infill material suppliers and other specialty service companies.

Requiring a manufacturer of synthetic turf and infill to establish a system to track the chain of custody of synthetic turf and infill is not feasible, would discourage further reuse and recycling technological advancements, would negatively impact communities of color, the environment and player safety and penalize property owners who have installed synthetic turf.

Establishing a system to track the chain of custody of the synthetic turf and infill from manufacturer to their installation, use, reuse, recycling and final disposal is not feasible given the reuse, repurposing and recycling of next stage turf that is already occurring. As a logistical issue, the manufacturer of the synthetic turf is typically different than the manufacturer of the infill and the reuse and recycling options are different for system components. The synthetic turf system is designed chiefly for the owner's needs and is based on the sports being played, climate, usage and funding available and combines different components from across the supply chain.

STC member companies have already developed reuse and recycling options for synthetic turf that has reached the next stage of its useful life that will now be discouraged if this bill is enacted. Several member companies are accepting recovered synthetic turf. They provide assistance with removal and will clean and warehouse turf that is suitable for reuse. Reuse options include arena football fields, tee mats, sand trap liners, landscape liner material, golf products and door mats. Members have also developed processes to collect and separate materials so that next stage turf can be processed into

post-consumer recycle content products. Turf received in rolls is processed into plastic pellets that are suitable for injection molding, rotational molding and profile extrusion. Products produced include carpet and turf backing, resilient flooring and infill. Industry participants are also accepting next stage turf, separating out the infill, and melt down the yarn and backing into a paste that can be poured onto the base layer of a new field to serve as shock absorption for players. It's not feasible to have a chain of custody on synthetic turf and/or infill that is processed into post-consumer recycle content products, like plastic pellets. Further, mandating this type of program will discourage future reuse and recycling technological advancements and secondary markets that find value in the next stage turf.

This type of program would also increase the costs of synthetic turf systems (base, turf and infill), since manufacturers would likely pass on the additional costs to the end users. For local schools and municipalities, adding costs to the bid costs means less money for field maintenance programs, which could mean a less safe playing surface. These economic hardships for local schools and municipalities have been accelerated based on the negative impacts of COVID-19.

Mandating a chain of custody program would negatively impact communities of color, the environment and player safety. Communities of color, typically in urban areas, have less space available to promote year-round enjoyment and activity for children of all ages. A typical synthetic turf field can be used three times as much as a comparably-sized natural grass field. A grass field simply cannot remain lush if it is used more than three to four days a week, or in the rain, or during the six months of the year when grass does not grow in Maryland. Otherwise the field will become unsafe, rock-hard and covered in dirt. Since synthetic turf can withstand so much wear and tear, many schools can even rent their synthetic turf fields to local sports team and organizations to bring in extra funding. This frees up new funds for the classroom.

Synthetic turf fields enable increased activity in nearly all weather conditions which helps battle the childhood obesity epidemic in Maryland and promotes well-being. Additionally, having a majority of children in a remote learning environment due to COVID-19 has exacerbated this obesity epidemic. The Centers for Disease Control and Protection states that in the U.S., the percentage of children and adolescents affected by obesity has more than tripled since the 1970s. Additionally, the Department of Health and Human Services recommends that children and adolescents aged 6 to 17 years should have at least 60 minutes of physical activity each day. The CDC reports that of Maryland's children 2-5 years old, 16.5 percent are overweight and 15.7 percent are obese.

Reclaimed and recycled materials that are being used in synthetic turf fields is growing. This proposed program would not promote environmentally-friendly synthetic turf system designs because producers are already starting to moving toward reduced material-use per square foot produced, reduced energy use in producing and delivering synthetic turf, and improved environmental impacts.

By mandating this program with additional costs for synthetic turf, the use of synthetic turf in the state of Maryland will decline, which will increase water consumption and CO2 emissions, and the use of harmful lawn chemicals. One typical grass sports field uses between 500,000 to a million gallons of

water each year.1 The use of synthetic turf decreases harmful CO2 emissions by reducing the use of gas-powered lawn care equipment. As of February 2021, there are an estimated 415 ppm (parts per million) of carbon dioxide in the atmosphere.2 The burning of fossil fuels releases carbon dioxide and other greenhouse gases. There is almost unanimous agreement in the scientific community that the increase in carbon emissions into the atmosphere contributes to climate change, which can have serious consequences for humans and our environment.

Also, synthetic turf does not require harmful lawn chemicals in order to maintain a healthy and safe surface. Lawn chemicals are the fertilizers, herbicides and insecticides used in lawn care. The Environmental Protection Agency states that lawn chemicals have the potential to run off into streams, harming fish and other animals and contaminating our drinking water.3 Health problems including birth defects and allergies are just a few of the effects of contaminated water exposure.

Furthermore, landscape turf installs for certain residential and commercial applications typically run larger than 5,000 square feet. No other state requires a chain of custody mandate for synthetic turf manufacturers and penalizes those property owners that have made the investment to save water, limit CO2 emissions and raise their property values.

Thank you for your consideration.

[1] Synthetic Turf Council, Benefits of Synthetic Turf, https://cdn.ymaws.com/www.syntheticturfcouncil.org/resource/resmgr/media/benefits_of_synthetic_turf.pdf.
[2] CO2 Earth, https://www.co2.earth/.
[3] Environmental Protection Agency, The Facts About Lawn Chemicals, https://cfpub.epa.gov/npstbx/files/marc_lawnchemicals.pdf.