

HB0857 - Synthetic Turf and Turf Infill - Chain of Custody and Reuse

Sponsored by Delegate Mary Lehman

Hearing - 2/24/2021; Environment and Transportation Committee; Economic Matters Committee
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There is a concerning lack of clear answers, no meaningful regulations or independent accountability, and a history of unsubstantiated claims by the artificial turf industry regarding disposal and “recycling” of the component materials that make up their product.

I FULLY SUPPORT HB0857 WHICH WILL HELP ENSURE RESPONSIBLE END OF LIFE MANAGEMENT OF SYNTHETIC/ARTIFICIAL TURF.

RECENT NEWS ARTICLES AND COVERAGE

A number of recent news outlets have covered the growing problems associated with the end of life disposal, and challenging “recycling” issues, surrounding artificial turf:

- 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>

BACKGROUND INDUSTRY INFORMATION AND REASONS WHY REQUIRED CHAIN OF CUSTODY DOCUMENTATION IS IMPORTANT

All artificial 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 artificial 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, scrap tire waste and/or other alternative infill), this represents a massive amount of material which must be managed.

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.

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

The STC guide itself recommends chain of custody documentation. The guide also describes the many challenges associated with artificial turf recycling, stating that the amount of material to be handled is “enormous,” but offers very little in the way of specifics or actual answers. The STC guidelines admit, “The diversity of such component materials [in artificial turf] presents technical, economic and logistical challenges unlike other commonly recycled materials, such as plastic bottles, carpet and plastic bags.”

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

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

The report states, “Recycling of artificial football turf is not widespread. The majority of the manufacturers interviewed for this study claimed their products are ‘recyclable’, but none are taking significant steps to make sure this happens in practice.”

The report goes on to discuss, “The Synthetic Turf Council lists a large number of uses for rubber infill, such as various flooring or sound barriers in industrial or construction settings. These are listed as theoretical markets, but in practice there is no evidence that a significant market exists for the material beyond re-use in turf - a study for CalRecycle in California found that only 25–50 percent of SBR infill was reused, the remainder going to landfill. The study also did not find any specific examples of recycled rubber crumb being used in the manufacture of new products and concluded that there was a lack of information for field owners around how to most effectively and efficiently deal with their fields at the end of their life.”

The industry often uses 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.” The FIFA report admits, “Re-use is often erroneously referred to as recycling by some of the many businesses that specialize in turf removal.” This re-use can mean removing used (sometimes heavily deteriorated) plastic fields and laying the turf down elsewhere where it has the potential to continue to pollute. And then where does the material go after that? The industry often vaguely refers to products made from recycled turf but has offered little in the way of proof of those products in a transparent manner or on a scale that is practical and viable.

We do know there are currently no complete circular artificial turf recycling facilities in the United States at this time. Artificial turf often ends up landfilled, incinerated, dumped, or stockpiled. There are documented and reported stockpiles throughout the United States. Again, this is why chain of custody is critical.

The FIFA report adds, “Although typically re-use is generally viewed as a more preferable alternative to recycling for many products, this does not appear to be the case for artificial turf. The lack of evidence for a clear end market and the apparent fact that any re-use will have to be in a lower value application means that the argument for re-use is weak. Re-use of the turf by cutting it into smaller sections for domestic use is often viewed as a good end-of-life option, but when compared with recycling it may not be. Once the turf is cut up, it will almost certainly not be recycled after its second use. It is difficult to

capture and efficiently recycle large pitches, therefore small geographically scattered installations are even less likely to be recycled. This means the material will eventually be lost to landfill or incineration.”

The FIFA report raises the issue of disposal cost and transparency, stating, “This means that 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!”**

One of the largest artificial turf companies, Fieldturf, previously claimed to have a guaranteed “Take-Back” program, which they no longer actively advertise. Despite being repeatedly asked, nobody in the company could answer questions about how many artificial turf fields they “took back” and what actually happened to the material.

Of note, despite claiming to want responsible disposal and using the term “recyclable” in marketing materials, the artificial turf industry has previously fought against extended producer recycling laws and even against basic regulations which would require minimal accountability regarding disposal and recycling. For example, at the Maryland State legislature in 2019 and 2020, representatives from the Synthetic Turf Council, Fieldturf, and several scrap tire industry associations testified against bills which would have required greater transparency about industry disposal practices, and which would have promoted extended producer responsibility, rather than having the burden of disposal weigh fully on individual jurisdictions, school systems, and organizations.

When Mr. Dan Bond, President of the Synthetic Turf Council was directly asked at the Maryland State Legislature hearing in March 2019 if there were any artificial turf recycling facilities in the region, he answered that he would have to “look at their member list,” but that he knew of one facility in Denmark (referring to ReMatch; clearly not in the United States).

At another hearing in February 2020, Mr. Bond again testified and again was not able to provide information regarding artificial turf recycling facilities in North America. At that hearing Mr. Bond claimed to have information regarding a company called Target Technologies International Inc (a member of the STC) which will ship the plastic field component (not infill) to an undisclosed location in Malaysia, even though in prior conversations Mr. Bond claimed he was not aware of specifics of that company’s recycling program. Following the hearing Mr. Bond did not provide promised answers to basic follow-up questions. One year later (now) the questions have not been answered.

CONCLUSION

It should not be difficult for stakeholders to obtain basic verifiable information regarding responsible disposal or potential recycling of artificial turf – but it is. HB0857 will help ensure more responsible end of life disposal.

Thank you,
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