

**SB0321 – SUPPORT**

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SB0321 **SUPPORT** – Education, Health, and Environmental Affairs – Synthetic Turf and Turf Infill –  
Chain of Custody  
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Dear Chair Pinsky, Vice Chair Kagan, and Members of the Education, Health, and Environmental Affairs Committee:

Thank you for taking up this issue. **Safe Healthy Playing Fields Inc (SHPFI) strongly supports SB0321.** We are a grassroots non-profit based in Montgomery County, MD with volunteer partners and advocates across the country. This bill simply requires producers of synthetic turf and turf infill to report a chain of custody to the Maryland Department of the Environment, whenever a field is installed or removed.

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

All artificial turf fields have limited lifespans, typically about 8-10 years. Each field amounts to hundreds of tons of mixed plastic waste. Between the large number of artificial turf fields that must be removed every year, the petroleum-based plastic carpet, the shock pad, and the infill component of each field (consisting of shredded tire crumb, silica sand and/or other infills), this is a massive amount of material which must be managed. The industry itself characterizes the amount of material to be handled as “enormous,” and acknowledges that synthetic turf components have not always been handled or disposed of responsibly.

This bill creates a straightforward reporting of the chain of custody of the materials involved. For a typical synthetic turf field, that means an initial report upon installation, and nothing further until its removal, about a decade later.

**The Synthetic Turf Council’s own guidelines recommend chain of custody documentation.**

[https://cdn.ymaws.com/www.syntheticurfCouncil.org/resource/resmgr/guidelines/STC\\_Guideline\\_f or\\_Recycle\\_Re.pdf](https://cdn.ymaws.com/www.syntheticurfCouncil.org/resource/resmgr/guidelines/STC_Guideline_f or_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. These include recommendations and multiple examples of chain-of-custody, but there is little in the way of required accountability.

Some in the industry may use vague, “greenwashed” language when it comes to disposal of used turf. For example, an item may be described as “recyclable,” but in the absence of a facility able to handle the type and volume of material it is hard to defend the use of that term. We know there are no complete circular synthetic turf recycling facilities in the US. Old turf can be re-used but at some

point it must be landfilled, incinerated, “stored,” or –too often—dumped. Thus, chain of custody is critical. While it is too late for the tens of thousands of fields installed and removed around the US since the Astrodome field in 1966, **Maryland can set the example going forward.**

**This is an opportunity for the industry to demonstrate good stewardship.** Given the synthetic turf industry’s own words about environmental responsibility, this is an opportunity they should embrace.

**Key sports bodies have identified the problem.** 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!” [https://football-technology.fifa.com/media/1230/artificial\\_turf\\_recycling.pdf](https://football-technology.fifa.com/media/1230/artificial_turf_recycling.pdf)

**Numerous news outlets have covered the growing problems surrounding end-of-life disposal of synthetic turf - and the need for additional transparency and accountability:**

- 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 Environmental Friendly Turf Removal*; February 20, 2020 <https://www.marylandmatters.org/2020/02/20/proposed-legislation-could-see-more-environmentally-friendly-turf-removal/>

It shouldn’t be hard to get basic verifiable information regarding chain of custody of synthetic turf material and turf infill – but it is. **SB0321 will ensure more accountable handling of the material.**

Thank you for considering our views,

Diana Conway, President, Safe Healthy Playing Fields Inc.