



January 31, 2022

Maryland General Assembly
Education, Health and Environmental Affairs Committee
Senate Office Building
Annapolis, MD 21401

Written Testimony in opposition of: Senate Bill No. 321:

Submitted by:
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President and CEO
Synthetic Turf Council (STC)
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Dear Chair Pinsky, Vice Chair Kagan and members of the Education, Health and Environmental Affairs Committee,

My name is Melanie Taylor and on behalf of the Synthetic Turf Council (STC), I am writing in opposition to Senate Bill No. 321. Mandating synthetic turf and infill producers to track installed fields from manufacture to final disposal presents several logistical issues, including complicated chain-of-custody disputes. Bill 321 does nothing to discourage dumping or encourage proper reuse, repurposing or recycling, resulting in higher fees and potentially less use of available recreational spaces for Marylanders.

The STC is headquartered in Harford County, Forest Hill, Maryland and is a 501(c)6 trade association representing the synthetic turf industry. Founded in 2003, the STC represents over 230 members and promotes industry excellence through voluntary guidelines, certifications, and other learning platforms. Full members include builders, design professionals, civil engineers, testing labs, maintenance providers, manufacturers, suppliers, installation contractors, infill material suppliers and specialty service companies. Affiliate members include buyers and end-users, such as athletic directors, municipal officials, researchers, university professors and students.

On behalf of the entire synthetic turf industry, the STC promotes the proper reuse and denounces improper disposal of synthetic turf, as outlined in our guidelines. The STC has released several model programs and industry guidelines that would effectively encourage turf repurposing and/or recycling at a lower cost/no risk to the taxpayer. It is our view that these guidelines do more to promote responsible end-of-life use than Bill 321. These guidelines outline best practices on **proper end-of-life handling for field owners, school boards, athletic directors, government agencies, and municipal officials.** Each component of synthetic turf can be recycled or put into a secondary use, and the industry has worked to educate customers on all their available options. We are also encouraged by product and process innovation in the industry making great progress towards more sustainable and environmentally responsible solutions for customers.



The structure of the chain of custody in Bill 321 presents several issues, which will result in "orphaned" synthetic turf fields and confusing jurisdictions. The chain of custody process in Bill 321 puts the burden of reporting and tracking on synthetic turf producers, rather than field owners. If producers end commercial operations over the long lifecycle of the synthetic turf field, it will result in fields being "orphaned" and untracked on the government's database. **Also, many synthetic turf fields include components from multiple manufacturers, meaning chain of custody ownership often cannot be assigned to a single company.** Furthermore, the chain of custody as currently outlined does not correctly track synthetic turf that is exported out of state and then imported back in state, as there is no chain of custody tracking outside Maryland. The process being proposed does not take place as logistically laid out in SB 321 anywhere else in the country.

A more appropriate tracking solution would be to assign the chain of custody responsibility initially to field owners at installation and subsequently to the companies hired to remove the fields and so on, ultimately assigning responsibility to those who take possession and ownership of the materials.

The chain of custody procedure described in the bill will not lead to more or safer synthetic turf reuse or recycling. The bill specifies that a chain of custody must be maintained but does not encourage alternate uses for the synthetic turf, nor does it distinguish between dumping or reusing and recycling turf. If anything, the increased reporting standards could impose more costs and regulatory hurdles on synthetic turf handling, resulting in more owners opting to dump rather than recycle turf. Field owners often resell individual turf system components or donate them to organizations within their communities, such as local driving ranges, band practice fields, pet parks, bullpens and batting cages and equestrian stables.

The policies in Senate Bill 321 could disincentivize schools and recreation departments from buying synthetic turf, leaving Marylanders worse off. The increased tracking responsibilities imposed on producers can result in higher upfront installation costs for Maryland's schools and parks departments. While the cost of tracking is low for the owners of fields, who regularly maintain the turf, it is high for manufacturers, who do not work with fields post-installation day-to-day and who would ultimately take on an unknown level of effort and risk. These hurdles and higher costs will result in more schools opting to maintain grass fields, which are already overused and provide significantly lower usage, not ADA-compliant and cannot be used year-round, leaving our children and athletes worse off. The increased maintenance of these fields also will require the increased usage of sod, fertilizer, herbicides, mowers, and other maintenance necessities that are not environmentally friendly.

Mandating a chain of custody program, at the manufacturer level, would negatively impact urban communities, the environment and player safety. Typically, 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. In such conditions, a field may become rock-hard and unsafe for play. 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. Having a majority of children in a remote learning environment due to COVID has exacerbated obesity. 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.

The STC supports the continuous advancement of the safety, performance and growth of recycling opportunities of synthetic turf systems. The use of reclaimed and recycled materials from synthetic turf fields is growing. 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 natural grass sports field uses between 500,000 to a million gallons of water each year. The use of synthetic turf decreases harmful CO₂ emissions by reducing the use of gas-powered lawn care equipment.

The STC has discussed this bill with the sponsor of House Bill 131, including amendments that more clearly define the duration of ownership for producers and transfer of custody to owners of fields installed after January 1, 2023. The STC wants to engage and provide counsel on legislation that codify established industry guidelines that effectively encourage sustainability and proper end-of-life handling.

Thank you for your consideration.

Melanie Taylor

President and CEO

Synthetic Turf Council (STC)

www.syntheticurfCouncil.org