



March 22, 2023

Maryland General Assembly  
Education, Energy and Environment Committee  
Senate Office Building  
Annapolis, MD 21401

**Written Testimony in opposition of: House Bill No. 299:**

Submitted by:  
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Synthetic Turf Council (STC)  
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Dear Chair Feldman, Vice Chair Kagan and members of the Education, Energy and Environment Committee

My name is Melanie Taylor and on behalf of the Synthetic Turf Council (STC), I am writing in opposition to House Bill No. 299 as we discuss the primary reasons below.

As a 501(c)6 trade association representing the synthetic turf industry, the STC office is headquartered in Harford County, Forest Hill, Maryland. Founded in 2002, the STC represents over 200 members and promotes industry excellence through voluntary guidelines, certifications, and other learning platforms. Our membership includes representatives from every stage of installing and maintaining a turf field, including builders, design professionals, civil engineers, testing labs, maintenance providers, manufacturers, suppliers, installation contractors, infill and shock pad suppliers and specialty service companies.

The STC has two primary issues with House Bill 299, as amended:

1. **Definition of “custodian”** – As written, a custodian includes "a person that: owns or is in control of synthetic turf". We recommend a clearer definition of custodian as the owner of the turf system to help narrow the responsible parties so that when a new field is installed, only one party reports it one time.
2. **Threshold of 5,000 square feet minimum** – As we mentioned in the House committee hearing, we believe sports fields average at 75,000 square feet and playfields 30,000 to 50,000 square feet. Anything below that would include landscape (residential) and commercial applications that may have lifespans up to 15 and 20 years.



The STC is committed to protecting the environment and currently provides the latest guidance and resources on the best ways to reuse and/or recycle each component of a synthetic turf field. We are happy to provide counsel on such bills that would further 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](http://www.syntheticurfCouncil.org)