



RECYCLED
RUBBER COALITION

February 13, 2023

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

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

My name is Stratton Kirton and on behalf of the Recycled Rubber Coalition (RRC), I am here today in opposition to House Bill 299, with the caveat that we believe there are three changes to the legislation that could strengthen the legislation and subsequently change our position on the bill.

The Recycled Rubber Coalition is a national organization representing rubber recyclers and companies that use recycled rubber. Our coalition is a resource for policymakers and the public on the responsible and safe uses of recycled rubber. Additionally, we work with state and local policymakers to discuss ways we can increase the reuse and recycling of rubber tires.

I am here today because one of those reuses is as infill for synthetic turf fields. Our members have a history of operations in Maryland and thus are deeply invested in what happens in this state. Additionally, I happen to be a resident of the great state of Maryland.

We have three primary changes we would like to see to House Bill 299:

- **Include a minimum square footage threshold.** Without a minimum threshold, the bill as written would potentially subject any number of owners of small pieces of turf—think of a dog groomer who has an indoor play area—to the reporting requirements and fines set forth in this legislation. We do not believe this is the intent of the legislation and recommend restoring a square footage minimum to the legislation.
- **A clearer definition of "custodian":** As written, the definition of custodian could result in multiple parties reporting on the same turf at the same time. A clearer definition can help to ensure it is the owner or someone acting on behalf of the owner who is responsible for reporting.

- **Extend the implementation date:** As has been noted, this legislation is the first of its kind for Maryland and we think a longer implementation date will give the Maryland Department of the Environment more time to develop the program and allow for greater levels of education on the new requirements to field owners.

We cannot support the bill as it is currently drafted, but with this bill and future relevant legislation, we would love to work with any members on policy recommendations that continue to improve tire recycling in Maryland, as we recently outlined in [our white paper](#).

Thank you for your consideration,
Stratton Kirton
The Recycled Rubber Coalition