

## HB 299 - FAVORABLE

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HB 299 FAVORABLE - Environment – Synthetic Turf and Turf Infill – Chain of Custody

February 13th, 2023

Before the House Environment and Transportation Committee

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

**Safe Healthy Playing Fields Inc (SHPFI)** is a grassroots, non-profit organization based in Montgomery County, MD and includes volunteer partners and advocates across the country. **SHPFI strongly supports HB131**, which would require owners of synthetic turf and turf infill to report chain of custody of synthetic turf and turf infill to the Maryland Department of the Environment.

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

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, tire crumb and/or other infills), this represents a massive amount of material which must be managed. In fact, the industry has characterized the amount of material to be handled as “enormous,” and has acknowledged that synthetic turf components have not always been handled or disposed of responsibly. This bill requires a simple, straightforward reporting of the chain of custody of the materials involved.

**The Synthetic Turf Council guidelines themselves recommend chain of custody documentation.**

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

The industry has often used 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.” We do know there are currently no complete circular synthetic turf recycling facilities in the United States at this time. Synthetic turf can be re-used, landfilled, incinerated, dumped, or stockpiled. Again, this is why chain of custody is critical.

**Basic reporting is an opportunity for the industry to be good stewards of their product and the environment.**

[https://football-technology.fifa.com/media/1230/artificial\\_turf\\_recycling.pdf](https://football-technology.fifa.com/media/1230/artificial_turf_recycling.pdf)

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!”

**A number of recent news outlets have covered the growing problems surrounding the end-of-life disposal of artificial turf - and 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 should not be difficult for stakeholders to obtain basic verifiable information regarding chain of custody of synthetic turf material and turf infill – but it is. HB299 will help ensure more accountable handling of the material.

Thank you,  
Amanda Farber

Safe Healthy Playing Fields Inc