



January 17, 2022

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

**Written Testimony in opposition of: House Bill No. 131:**

Submitted by:  
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Synthetic Turf Council (STC)  
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Dear Chair Barve, Vice Chair Stain and members of the Environment and Transportation Committee,

My name is Melanie Taylor and on behalf of the Synthetic Turf Council (STC), I am writing in opposition to House Bill No. 131. 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 131 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 Forest Hill, Maryland and is the world's largest organization representing the synthetic turf industry. Founded in 2003, the STC represents over 230 members and promotes industry excellence through guidelines, certifications, and other learning platforms. Membership includes builders, landscape architects, engineers, testing labs, maintenance providers, manufacturers, suppliers, installation contractors, infill material suppliers, specialty service companies and 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.** The STC has released several model programs and industry guidelines that would effectively encourage turf repurposing and/or recycling at a lower/no risk to the taxpayer than Bill 131. 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 131 presents several issues, which will result in "orphaned" synthetic turf fields and confusing jurisdictions.** The chain of custody process in Bill 131 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. A more appropriate tracking solution would be to assign the chain of custody responsibility initially to field owners 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 misguided policies in Bill 131 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, as turf manufacturers will have to pass on tracking costs to customers. 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 worse off.

**The STC supports the continuous advancement of the safety, performance and growth of recycling opportunities of synthetic turf systems.** The STC has discussed this bill with the sponsor, 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 is happy to provide counsel on future bills that would codify established industry guidelines that effectively encourage sustainability and proper end-of-life handling.

Thank you for your consideration.

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[www.syntheticurfCouncil.org](http://www.syntheticurfCouncil.org)