

January 17, 2022

Maryland General Assembly
House Office Building
Annapolis, MD 21401

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

Submitted by:
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Dear Chair Barve, Vice Chair Stain and members of the Environment and Transportation Committee,

My name is Darren Gill and on behalf of FieldTurf, I am writing in opposition to House Bill No. 131. Mandating that synthetic turf producers track installed fields from manufacture to final disposal is onerous, presents several logistical issues, does nothing to discourage dumping or encourage reuse of old fields, and will result in less available recreational spaces for Marylanders.

FieldTurf is the largest turf manufacturer in North America and the inventor of infilled artificial turf. We have installed over 25,000 fields globally and are the leading supplier in the State of Maryland. Some of our local clients include the University of Maryland and Towson University, along with numerous counties across the State.

FieldTurf has made great strides promoting the reuse and penalizing the improper disposal of synthetic turf. In 2021 we launched a program called **Goal Zero**, the first of its kind in the industry – committing to an ambitious zero waste to landfill goal by 2025. We remain committed to leading the industry and believe that we are at the forefront of some exciting reuse and recycling options for our clients.

Moreover, the Synthetic Turf Council has released several model programs and industry guidelines that would effectively encourage turf recycling at a lower/no risk to the taxpayer than Bill 131. These guidelines outline best practices on proper disposal and reuse methods 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.

Despite our aforementioned commitment to recycling along with the launch of Goal Zero, we are in opposition of House Bill No. 131 for the following reasons:

- **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 artificial 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 imported out of state and then back in state, as there is no chain of custody tracking outside Maryland. A better tracking solution would be to assign the chain of custody responsibility to field owners or the companies hired to dispose of the fields, who are best equipped manage end of life processing and comment on the state of fields post-installation.

- **The chain of custody procedure described in the bill will not lead to more or safer synthetic turf reuse.**
 - 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 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 batting cages and youth non-profits. Bill 131 would needlessly complicate this process, essentially requiring that synthetic turf fields be recycled whole.

- **The misguided policies in Bill 131 could disincentive 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. These hurdles and higher costs will result in more schools opting to maintain grass fields, which are not ADA-compliant and cannot be used year-round, leaving our children and worse off.

FieldTurf remains dedicated to the continuous improvement of the performance and environmental impact of synthetic turf systems and is happy, along with the Synthetic Turf Council, to provide counsel on future bills that would codify established industry guidelines that effectively encourage recycling and proper disposal.

Thank you for your consideration.



Darren Gill
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FieldTurf