

Dear Mr. Chairman and Committee Members:

Thank you for allowing our testimony today in support of HB131. I urge you to vote favorably on HB131. Transparency and accountability is required in disposal of this significant solid waste that will adversely affect our waterways and groundwater when not disposed of appropriately. A Chain of Custody system will also be a support for responsible recycling when that becomes available since the fate of the field will become transparent.

This is common-sense, good government. The cost of trying to remediate the harm from just one improperly handled field is more than the minimal cost of compliance and oversight. We amplify the effectiveness of our Maryland Department of the Environment when we supplement their policing with

This bill would require manufacturers and owners of synthetic turf and turf infill to report chain of custody of the turf and infill for reuse, recycling, or final disposal. Currently there are no such regulations despite the fact that each turf field contains tens of thousands of pounds of chemical-laden plastic and hundreds of thousands of pounds of granulated infill (usually tire waste, or alternative infills, and silica sand). According to the Synthetic Turf Council, the industry's leading association, one thousand deconstructed fields per year in the U.S. represent 80 million square feet of turf carpet weighing 40 million pounds and 400 million pounds of infill.

Synthetic turf's typical lifespan is a period of 8-10 years. Used synthetic turf materials may be landfilled, incinerated, repurposed or dumped in communities which then must deal with the waste. The synthetic component materials that make up artificial turf carpet systems contain known aquatic and human toxins, carcinogens, endocrine disruptors, heavy metals, carcinogens, and immune disruptors such as PFAS, or "forever chemicals."

Several Maryland municipal waste facilities do not accept the volume, weight, and mixture of synthetic turf which then leads to illegal dumping. Numerous examples of irresponsible disposal exist including dumped or stockpiled material in lower income communities, including a 2018 example where a turf field from Richard Montgomery High School in Montgomery County was dumped near the Bird River in Baltimore County. Another field (Walter Johnson HS) was reportedly shipped to an uncertain fate halfway around the world in Malaysia.

The technology for recycling synthetic turf, which involves separating the plastic grass and backing from the sand and rubber infill is complicated and has not been fully developed, so when a synthetic turf owner wants to do the right thing and tries to recycle, they have limited options. Right now, municipalities and jurisdictions in Maryland as well as other regions across the country where these plastic carpets are dumped are the same jurisdictions that are forced to deal with the environmental and physical mess as they have no way of knowing who dumped the used turf without a chain of custody tracking system, as proposed in HB131. A Chain of Custody system will also be a support for responsible recycling when that becomes available since the fate of the field will become transparent and customers will want to do the right thing.

Our environment, waterways and municipalities suffer from inappropriate disposal of the plastic carpeting and infill from synthetic turf. Stakeholders have the right to know what happens to materials and hold those responsible for the materials accountable through a documented chain of custody reporting. Transparency and accountability regarding synthetic turf disposal must be required.

We support this bill and recommend a FAVORABLE report in committee.