



Olivia Bartlett, Co-Lead, DoTheMostGood Maryland Team

Committee: Environment and Transportation

Testimony on: HB0131 - Environment – Synthetic Turf and Turf Infill – Chain of Custody

Position: Favorable

Hearing Date: January 19, 2022

Bill Contact: Delegate Mary Lehman

DoTheMostGood (DTMG) is a progressive grass-roots organization with more than 3000 members across all districts in Montgomery County as well as several nearby jurisdictions. DTMG supports legislation and activities that keep all the members of our communities healthy and safe in a clean environment and that address equity for all residents in our communities. DTMG strongly supports HB0131 because it will provide transparency about disposal of toxic used synthetic turf and turf infill for synthetic turf fields above 15,000 sq ft.

Synthetic turf fields are made from rolls of plastic “grass” blades weighed down and filled in with hundreds of thousands of pounds of “infill” made from ground up used tires, silica sand, and/or alternative plastic particles. The plastic “grass” contains PFAS and other toxins and ground up tires are also known to contain multiple toxins. Each synthetic turf playing field contains about 200 tons of toxic mixed plastic waste: approximately two acres of plastic carpet with infill, typically from about 40,000 shredded waste tires or other plastic infill.

The removal and replacement cycle for synthetic turf fields is typically every six to ten years. This results in a huge amount of toxic waste. Local, national, and international media outlets have covered the growing problem of synturf waste. *The Atlantic*, *Salon* and *Maryland Matters* all published “*Fields of Waste*”, an investigative report documenting the massive accumulation of used synthetic turf material throughout the US. There is no recycling of synthetic turf in US. Anne Arundel, Prince George’s, and Montgomery County municipal solid waste facilities report they would decline used synthetic turfs due to volume and weight. There are also no state or federal regulations for safe disposal of synthetic turf or its infill.

Instead, there is a history of unsubstantiated and inaccurate claims from synthetic turf companies regarding the reuse, recycling, and disposal of their product. These are refuted by the many examples of irresponsible disposal – including dumping the material in lower-income communities. The *Maryland Matters* publication included photos of synthetic turf and tire waste infill being moved in May 2018 from a high school in Montgomery County to a property beside Bird River in Baltimore County, which was documented at the time by citizens asking questions and conducting their own research.

HB0131 will address this important and growing problem by requiring each producer of new synthetic turf and turf infill used on playing fields over 15,000 sq. ft. to track the chain of custody of the synthetic

turf and turf infill from manufacture to installation, use, reuse, recycling, and final disposal, and to report the chain of custody to the Maryland Department of the Environment. Owners of existing synthetic turf fields will be required to report the location of the installed field and the chain of custody for its reuse, recycling, and final disposal.

In a 2019 Maryland legislative hearing on disposal of synthetic turf, the president of the leading trade group, the Synthetic Turf Council (STC), acknowledged that there are no laws or regulations regarding the disposal of synthetic turf. The STC itself recommends end-of-life chain of custody certification and describes the disposal issue as “enormous” and “challenging.” STC members can follow its *Guidelines to Recycle, Reuse, Repurpose, and Remove Synthetic Turf Systems*. However, the guidelines are voluntary and there is no incentive to do so. Typical disposal is ‘stockpiling,’ landfill, dumping, or incineration – all resulting in pollution of our environment with plastic, toxic crumb rubber, and other toxic waste.

In the absence of an industry-led initiative, legislation is needed to ensure transparency and accountability when synthetic turf fields and infill reach the end of their lifespan. HB0131 simply requires reporting to MDE each time a field is installed, moved, reused, or disposed. The reporting requirement is a simple, non-burdensome data-point. There is no requirement for any approval from government. Stakeholders and citizens should be able to access a chain of custody showing what happens to the material. The STC’s own guidelines support this goal. STC and individual firms have long claimed to be good stewards who aim for repurposing, reusing, and recycling. This is their chance to show their commitment to our communities and the environment.

The reporting will also assure buyers they are dealing with an honest, transparent, accountable vendor. They should be able to use their compliance with reporting requirement as a selling point. The reporting requirement will also assure buyers their purchase won’t wind up just being dumped somewhere.

Maryland is not alone in facing this problem, but we now have an important opportunity to move toward a solution by enacting HB0131. The bill will prevent improper disposal of a significant quantity of plastic or mostly-plastic material, an increasingly urgent issue. Therefore, DTMG strongly supports HB0131 and urges a **FAVORABLE** report on this bill.

Respectfully submitted,

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