

June 21, 2023

Ben Allen, Chair
Environmental Quality Committee
1021 O Street, Suite 3230
Sacramento, CA 95814

Dear Senator Allen:

On behalf of the Synthetic Turf Council (STC) and its members, we must respectfully “Opposed Unless Amended” AB 1423 (Schiavo), which restricts the use of perfluoroalkyl and polyfluoroalkyl substances (PFAS) in artificial turf. STC members include builders, landscape architects, testing labs, maintenance providers, manufacturers, suppliers, installation contractors, infill material suppliers and other specialty service companies.

As currently drafted, AB 1423 creates significant compliance challenges for artificial turf manufacturers and suppliers for the following reasons:

- 1) The bill a ban on the sale of artificial turf containing intentionally added PFAS on January 1, 2024 to certain public entities and by January 1, 2025 for all sales in California. These dates do not provide enough time for manufacturers and suppliers to develop viable alternatives for the market place. We request that both dates be changed to January 1, 2026, which is in-line with other PFAS legislation currently pending.
- 2) The bill also intends to regulate levels of unintentionally added PFAS to 1 part per million (PPM) in total organic fluorine. While our manufacturers and suppliers fully intend to comply with the provisions of the bill related to intentionally added PFAS, we are concerned that trace quantities of a chemical may be present in natural or synthetic ingredients, recycled content, manufacturing processes or equipment. Therefore, we believe it would be more prudent (in addition to allowing for testing protocols to be developed) to establish the compliance threshold for unintentionally added PFAS at 100 PPM beginning in 2026 and 50 PPM in 2028. These thresholds have been previously recognized by the legislature in AB 1817 (Ting) (2021) and AB 652 (Friedman) (2021).

We urge the committee to consider these amendments to ensure that businesses can remain in compliance while serving its California customers.

Sincerely,

A handwritten signature in black ink, appearing to read "Melanie Taylor". The signature is fluid and cursive, with a large initial "M" and "T".

Melanie Taylor, President & CEO, Synthetic Turf Council