

The Honorable Inez Tenenbaum, Chair
Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814

Dear Chair Tenenbaum:

First I would like to commend you on your lifetime of working for the well-being of children and particularly your closing statement at the October 21-26, 2009, Third Biomedical Consumer Product Safety Summit, in which you made clear that times have changed and that under your watch safety must be built into products.

I am writing you today on a matter of much concern in my state of Maryland: replacement of living, breathing grass athletic fields with synthetic turf fields composed of plastic and used tire crumbs. The purchasing officials and parents of players have relied on the "safe for children" stamp of approval issued in 2008 by the Consumer Product Safety Commission. Considering that the study on which this approval was based focused solely on lead and examined only the plastic mat, not the pulverized tires, which are composed of known toxins, it clearly did not support such a broad declaration of safety.

The result of the CPSC stamp of approval, however, has been an ever increasing number of these fields installed at schools and in parks at multiples of the cost of installing a very good grass field. Once such a field is installed, it is highly unlikely it will ever be reconverted to grass because of the huge expense of the gravel bed underneath. Yet the fields have been known to fail and need replacement in as few as 5 years with heavy use, locking municipalities into a budget-busting cycle.

But the potential for impacts on children's health and the health of our waterways is an even greater concern. I am aware of the objections of Connecticut Attorney General Blumenthal in his letter of August 19, 2008 (<http://www.ct.gov/ag/cwp/view.asp?Q=421480&A=2795>) and of Congresswoman DeLauro, again in August 2008 (<http://superfill.net/2008/08/delauro-takes-cpsc-to-task-artificial-turf-report-flawed>). I have also seen the analysis by Dr. David Brown for Environment and Human Health (http://www.ehhi.org/turf/turf_study_analysis_0808.shtml) and am convinced that artificial turf in its present incarnation has not been "proven" safe.

As a society, we are now attempting to remove the neurotoxin lead and endocrine disruptor phthalates from children's products. However, artificial turf fields and playground surfaces used by children were inexplicably exempted.

I urge you therefore to revoke the exclusion and consider artificial turf and turf playground surfaces as children's products requiring strict testing for lead and phthalates; and to rescind your blanket approval of artificial turf as "safe for children."

Sincerely,

Senator Jamie Raskin etc.