

To: NSW Government
Planning Department

Date: 23rd April 2024

Re: Submission regarding the Draft Guidelines for Synthetic Turf in Public Open Spaces.

The Turf Growers Association of NSW Inc (Turf NSW) is the representative body for the turf production industry in NSW. Our vision is to develop and promote the natural turf production industry to improve the economic, environmental, and social wellbeing of the NSW community.

We are compelled to respond to the public consultation on the Draft Guidelines for Synthetic Turf in Public Open Spaces due to significant concerns regarding its current state. We believe that the draft in its present form, falls markedly short of achieving its intended objectives.

The guidelines lack the specificity and actionable directives necessary to guide decision-makers effectively, posing a risk to the environmental and communal integrity of public open spaces.

Therefore, we request the inclusion and immediate revision of the following key actions in the guidelines, to ensure they meet the necessary standards of clarity, sustainability, and safety:

- 1. Mandatory Detailed Checklists:** The absence of detailed, actionable checklists for the planning, installation, and maintenance of synthetic turf is unacceptable. We insist on the integration of comprehensive checklists that address all critical aspects of decision-making, mirroring the structured approach in Appendix 1 of the [NSW Government Synthetic Turf Study in Public Open Spaces Report](#) (October 2021). This is non-negotiable for ensuring an informed, transparent, and accountable decision-making process.
- 2. Rigid Material Standards:** The guidelines must enforce strict standards and regulations for all materials used in synthetic turf, aligning with the [NSW Chief Scientist's recommendations](#) (June 2023). The provision of Material Safety Data Sheets (MSDS) for all components should be non-optional, detailing environmental safety, health impacts, and recyclability. This is a fundamental requirement to safeguard public health and environmental integrity and should be outlined within the guidelines.
- 3. Impact of synthetic turf on community activities:** The draft guidelines do not give sufficient attention to the impact on the community of loss of green space for passive recreational activities and other sports including local cricket clubs. All community interests should be represented when councils are considering synthetic fields, not just those that make the most noise or have the most political influence. The guidelines should address the poor suitability of synthetics on some sports including cricket due to the likelihood of impacting player safety/or participation rates. The Cricket Australia Census in 2023 reported an increase in cricket participation across NSW by 8% including an increase of 123% in girls' participation. Synthetic surfaces are considered unusable for cricketers or will increase risks to players and therefore the conversion of natural turf surfaces to synthetic will reduce availability for participation or increase risks. These risks include injuries, ingestion, or absorption of materials (as reported NSW Chief Scientists & Engineer Report 2022 page 42 "The chemical signature of synthetic turf may be associated with health risks through pathways including ingestion (direct or indirect), inhalation, or dermal absorption"), heat exhaustion and match cancellations.

4. **Compulsory Environmental Impact Assessments (EIS):** The environmental risks posed by synthetic turf projects necessitate mandatory Environmental Impact Assessments for all proposals. This is critical for addressing the current inadequacies in environmental review processes and for ensuring comprehensive environmental stewardship. This process should also address sites that are unsuitable for synthetic surfaces and at risk of floods, bush fires and polluting the environment. Considering the experiences of climate impacts NSW has faced over the past several years, including bushfires and floods an EIS report must be a mandatory process. We request further information on how this will be addressed within the guidelines.
5. **Non-negotiable Community Transparency:** The community's right to be fully informed about the environmental and health risks associated with synthetic turf is indisputable. We demand a rigorous and transparent disclosure process within community consultations, ensuring all stakeholders are unequivocally aware of potential impacts and mitigation strategies. This should be clearly outlined within the guidelines.
6. **Explicit Public Funding Criteria:** To date, funding of many sports field projects has been specifically linked to synthetic turf. It is essential that the guidelines explicitly articulate the criteria for public funding of turf projects, ensuring an impartial and comprehensive assessment of synthetic versus natural turf. The decision-making process for funding allocations must be grounded in an exhaustive analysis of all benefits and drawbacks and not pre-determined by government.
7. **Cost Benefit Analysis:** Guidelines should include Local Government undertaking a cost benefit analysis comparing the lifecycle costs of synthetic compared to natural turf or hybrid options. This analysis must include disposal and asset renewal costs of synthetic surfaces.
8. **Transparency in Council Decision-Making:** The NSW Office of Local Government is currently developing guidelines to enhance transparency around the lobbying of councillors and council employees. Any engagement of decision-makers with synthetic turf industry representatives or consultants should be disclosed when synthetic fields are being considered. Communities should have full opportunity to present independent feedback on synthetic field proposals before any decisions are made.
9. **Transparent Inter-Agency Group Operations:** The draft guidelines refer to an Inter-Agency Group to follow up recommendations from the Chief Scientists Report. The operations of the proposed inter-agency working group must be made transparent, detailing objectives, participants, and timelines. The public deserves clarity on how the group will address the report's recommendations, ensuring accountability and fostering public trust.
10. **Healthy soils are identified as Australia's most valuable natural asset:** Soil health is recognised as central to delivering resilience to climate change and natural disasters, human health disease prevention and supporting ecological systems. The incorporation of soil health in urban environments is recognised as underpinning green infrastructure. The guidelines must ensure that decision makers assess, address, and avoid the impacts to soil health generated through the installation of synthetic turf.
11. **Comprehensive Irrigation Best Practices:** The Draft Guidelines refer to the development of guidelines for best practice irrigation of natural turf fields. We request details of this project including timelines and stakeholder involvement. These guidelines must cover both installation and maintenance protocols, aligning with sustainable and efficient water use strategies for public space management. An example of comprehensive guidelines can be found at <https://www.hunterwater.com.au/home-and-business/information-for-business/best-practice-guidelines>.

12. **Removal of misleading information:** The guidelines currently contain some information that is misleading and is more in line with sales and marketing jargon. This includes the wording:

- “synthetic surfaces modelled capacity of 60-70 hours per week” (Page 15). The Guidelines fail to mention that this would reduce the lifespan of the surface to around 5 years. This level of use would leave little time within normal working hours for staff to undertake the required maintenance. A study undertaken by AgEnviro Services of 1157 sports fields in the Sydney Basin found 99% of the fields receive less than 46 hours per week of formal sports and school usage.
- “Synthetic turf is recognised for being useable on all weather conditions” (Page 16) and “synthetic turf making it generally more suitable for drought and dry conditions (due to reduced water requirements)” (Page 18).

The reader is provided with incorrect information that could result in planning errors.

Synthetic turf is often not suitable for play when temperatures are hotter than 30°C (Pfautsch & Wujeska-Klaue, 2022 suggest 28°C). The Bureau of Meteorology website shows: **Eastern Sydney:** has an average of 25 days per year when temperatures are above 30°C (14% of the season). However, during the 2019 drought this occurred on 69 days (38% of the season); **Western Sydney:** 71 days per year on average above 30°C (40% of the season impacted). This would have occurred for more than half the season in the 2019 drought (110 days above 30°C), **Dubbo:** 90 days per year on average are above 30°C (50% of the season impacted). In 2019 this was 140 days out of the 180-day season! Clearly, using synthetic in dry areas or as a drought measure will result in either mass sport cancellations or play potentially occurring in unsafe conditions.

We request these key actions be fully integrated and detailed in the revised guidelines to ensure they serve their purpose of facilitating sustainable, safe, and effective synthetic turf installations.

Turf NSW encourages the NSW Government to consider investment in the natural turf sports field industry. It is evident that significant government funding is being allocated to synthetic sports fields yet little to no funding is provided for the improvement and education of quality natural sports turf surfaces. A well-constructed and maintained sportsfield can manage high level of use for both organised sport and community recreation without the massive financial, health, safety or environmental implications or exclusion of participation.

Industry maintenance practices, technology and science developments as well as developments in turf cultivars more suitable to Australian climatic conditions and sports surfaces, have improved immensely over the years. Investing in the development and education of sports field designers, decision makers and turf and greenspace managers will see a significant conversion to improved quality natural turf sports fields and green community spaces across NSW.

We trust that our submission will be met with the seriousness it warrants and that appropriate revisions will be made to the guidelines. Thank you for considering our input.

Sincerely

Troy Frank
President
Turf NSW