January 19, 2018

Environment Committee
300 Capitol Avenue
Hartford, CT 06106

RE: Task Force recommendations to the CT General Assembly on the CT Container Deposit Law

Dear Environment Committee Chairs, Vice-Chairs and Ranking Member:

On behalf of the undersigned organizations, we are writing to express our collective concerns related to draft recommendations from the Task Force to Study Methods for reducing Consumer Packaging (hereafter referred to as the “Task Force”), which deal with Connecticut’s Container Deposit Law (AKA the “CT Bottle Bill”).

On December 12, 2017, the Task Force voted 6-3 to adopt a set of draft recommendations to the CT General Assembly (CGA) on policies aimed at improving the state’s recycling infrastructure and achieving a 25% reduction in consumer packaging in our solid waste stream by the year 2024, among other goals¹. One of the goals (#6) explicitly mentioned “decreasing municipal costs associated with managing such waste.”

The undersigned organizations support the stated goals of this Task Force; however, we have strong concerns about the process surrounding that body, and the subsequent recommendations that were produced as a result of that process.

Included in those recommendations were three suggested changes to CT’s existing Bottle Bill program (see section 1.1).

Specific issues with the Task Force’s draft recommendations include:

- **Task Force Recommendation. 1.1.1:** “Earmark unclaimed bottle deposits (“escheats”) to recycling programs including education activities and infrastructure investments for both the public and private sector.” Also see recommendation 6.1, which suggests earmarking unclaimed deposits to be used to pay for a variety of recycling initiatives, none of which are associated with improving the existing bottle bill.

- We agree that a portion of the unclaimed deposits from the State’s bottle bill should be used to finance, enforce and improve recycling, but should be targeted toward the container deposit law. These moneys total approximately $30-$33 million annually. Dedicating a percentage of

unclaimed deposits to support the bottle bill with infrastructure improvements, enforcement, education, and other program-related expenses makes sense, but we strongly discourage the use of such funds for any unrelated programs.

- The state’s bottle bill has existed for decades with very little spent on public education. While the program’s redemption rate is still very high, at 50%, it trails behind other container deposit programs, which have redemption rates of 70% to 90%. The Task Force correctly highlights the importance of public education, and we believe more public education is urgently needed to rejuvenate our state’s container deposit program.

The Task Force then made two contradictory recommendations. 1.1.2 was a recommendation to EXPAND the State’s bottle bill, while 1.1.3 was a recommendation to GUT the bottle bill by removing aluminum and plastic containers from the deposit system. These two recommendations were written as follows:

- **Task Force Recommendation 1.1.2**: “Expand the bottle deposit to all glass bottles (including wine and liquor bottles) sold in the State to increase the quality and value of glass in the bottle deposit program as well as ensure removal of glass from the single stream program thus increasing the value of single stream recyclables and increase the deposit to $0.10 per bottle.”

- **Task Force Recommendation 1.1.3** “Consider making all other recyclable materials covered under the state’s bottle bill (plastic bottles and aluminum cans) no longer covered by any deposit bottle bill system and would flow into existing residential curbside programs, drop off programs and commercial recycling programs.

- **Sec. 1.1.3- We object to the Task Force recommendation of the removal of PET plastic and aluminum from the deposit system.** The incentive of a container deposit typically results in a recycling rate that is two to three times as high as containers without a deposit. Therefore, if the incentive of a deposit was removed, the recycling rate for these containers would decline dramatically, resulting in an increased volume of beverage containers ending up in landfills. A decline in the recycling rate of any packaging material is obviously contrary to the goals of the Task Force, and we can’t imagine why such a counter-productive measure was proposed. Furthermore, the suggestion to re-route materials back to municipalities is contrary to the Task Force’s goal of “decreasing municipal costs associated with managing” packaging materials.

Recommendation 1.1.3 ignores the work done by recycling and consumer advocates, container redemption centers, materials recyclers, and municipal resource recovery agencies to strengthen and modernize our existing container deposit law in recent years. Any recommendation to augment the existing container deposit system must be done in coordination with Connecticut’s municipal recycling authorities, reverse vending machine (RVM) operators, and redemption centers, in addition to environmental advocacy groups, waste haulers and materials recovery firms.

The undersigned groups maintain that the current process has served to undermine Connecticut’s existing beverage container deposit system, and should be scrapped in favor of a comprehensive, truly stakeholder-driven process. We respectfully urge the leadership of the CGA Environment Committee to work with existing stakeholders, including municipal resource recovery agencies, redemption centers, environmental and product stewardship advocates, industry experts and other affected parties to create
modernization of the CT Bottle Bill that increases recycling of single-serve beverage containers, improves efficiency, and creates a sustainable business model for redemption centers in Connecticut.

Thank you in advance for your consideration. Please do not hesitate to contact Louis Burch of Citizens Campaign for the Environment directly if you have any questions or need additional information. We appreciate your attention to Connecticut’s container deposit system and look forward to working with you on this important issue.

Respectfully,

Shahil Kantesaria
Central Connecticut Redemption Center

Louis W. Burch
Citizens Campaign for the Environment

Anne Hulick
Clean Water Action

Lori Brown
Connecticut League of Conservation Voters

Kathy Golas
Connecticut League of Women Voters

Alicea Charamut
Connecticut River Conservancy

Susan V. Collins
Container Recycling Institute

Jennifer Heaton-Jones
Housatonic Resources Recovery Authority

Mike Wellman
Envipco

Daniel McGowan
Product Stewardship Council

Rick & Kate Ross
Redemption Centers of America

Curt Bucey
Strategic Materials, Inc.

Chuck Riegle
TOMRA