



January 30, 2008

Committee on Environment
General Assembly, State of Connecticut
Hartford, CT

RE: Proposed Bill No. 5474

Dear Esteemed Members of the Committee:

I am writing today with reference to Proposed Bill No. 5474, AN ACT CONCERNING PRIVATE, MUNICIPAL, AND STATE RECYCLING.

Having been involved in the flexible packaging industry in Connecticut for nearly 38 years Mica Corporation may be uniquely qualified to comment on some aspects of the proposed legislation. As the president of this company as a life-long resident of the state, I have strong personal feelings on this issue. My participation in nationwide organizations such as the Flexible Packaging Association and the Technical Association of the Pulp and Paper Industry also give me insight

As a manufacturer of water-based adhesives and coatings used in flexible packaging Mica is a strong proponent of the mantra "REDUCE, REUSE, RECYCLE" which has been guiding public policy for some years. As a participant in the flexible packaging industry Mica is working every day to assist with the "reduce" part of these three "R"s. We are also keenly aware that the second most important of the "R"s is to reuse. One superb way of reusing the entire municipal solid waste stream is through modern waste-to-energy transfer. We are lucky enough, in Connecticut, to have more than one state of the art waste-to-energy plant that by nature of their work not only convert waste to usable electricity, but also *reduce* the volume of material that must eventually be land filled.

We applaud your effort to increase the scope of the third most important "R", recycling, and to develop a sustainability plan for the State. In reviewing the single paragraph of the proposed legislation, however, we find a number of red flag issues that we want to bring to the Committee's attention. First the use of the word "biodegradable" (line 4) is somewhat problematic. In order for this term to be universally understood, there must also be a time frame associated with its use. The object is to label a material as biodegradable only if it actually will biodegrade in a timeframe that mimics the rest of the waste with which it is land filled. Of course we have found that even a hot dog can last 15 years and may not be biodegradable in a normal landfill within the time-frame one would expect¹. A better goal would be to establish wide-scale composting of appropriate waste and encourage state residents to compost as much as possible. One must also be careful about how the term "compostable" is used, and again, a universally understood definition is a must. A comprehensive composting program would enable municipalities to

manage waste locally and receive benefits from their efforts without having to ship waste for remote processing.

The second issue we think you should reconsider is the third requirement "...to require all plastics to be recycled" (line 5). Certainly there are markets to be found for a wider variety of plastics than are now recycled in most Connecticut municipalities. However, we would caution that mandating that "all plastics" be recycled, without regard to potential markets for these materials is frivolous. In estimating the potential value of plastics one must also consider their intrinsic energy value if used as fuel in a waste-to-energy operation. By their design plastics are durable and therefore require a huge input of energy to make. They also have the potential to release this energy thereby "recycling" a high percentage of it in the form of electricity for community use. Please consider expanding the current waste-to-energy capacity within the state and recognize this technology as a way to "recycle" plastic as well as reduce our reliance on coal and natural gas as a source of electricity.

Lastly, we would like to comment on an aspect of the sustainability plan that would "permit municipalities to collect recyclables from businesses" (line 13). We have long wondered why the beneficial aspects of recycling at home are not mirrored at work. Mica Corporation has worked hard to be as environmentally friendly as possible, but we are hampered by lack of a comprehensive waste plan that includes aspects of recycling and waste-to-energy for business citizens. You may hear opposition to this from other businesses because of the added cost, but we are fully behind the effort. Reduce waste, reuse where possible and recycle waste for the good and financial benefit of our world.

We applaud the spirit of Proposed Bill No. 5474 and hope that you will incorporate our thoughts into the final version of the Bill.

Respectfully,

Mica Corporation

A handwritten signature in black ink, appearing to read "Jeffrey J. Siegel", written in a cursive style.

Jeffrey J. Siegel
President