



February 18, 2012

The Honorable Edward Meyer, Co-Chair
The Honorable Richard Roy, Co-Chair
Joint Committee on the Environment
Room 3200, Legislative Office Building
Hartford, Connecticut 06106

Dear Chairman Meyer and Chairman Roy:

On behalf of the members of the Product Management Alliance (PMA), I write to express the PMA's concerns regarding S.B. No. 89, *An Act Establishing a Mattress Stewardship Program*.

By way of introduction, the PMA is a coalition comprised of trade associations and individual companies that represent a broad array of consumer products, including mattresses, carpeting, electronics, toys, paper, packaging and transportation materials, plastics, personal care, and pharmaceuticals. The mission of the PMA is to support market-based extended producer responsibility (EPR) efforts, as well as voluntary incentives for increased recovery and sustainable product and package design.

S. B. No. 89 contains several provisions that are of serious concern to our members. These provisions include:

- Creating a collection scheme that will place undue burdens on manufacturers, retailers and transporters; there is no other state in the nation that has this type of process, which will result in increased costs for both consumers and businesses
- Mandating that private companies join a "representative organization"; this has serious implications for free trade and other legal challenges at the federal level, notwithstanding the fact that the bill attempts to immunize producers from state law

- Creating an inflexible and time consuming process for establishing and amending a product stewardship plan; the market changes rapidly and the process outlined in this bill does not provide a genuine opportunity for producers to react to changing circumstances

Our members, and the industries they represent, recognize the desire of the public and policymakers for environmentally responsible business practices. That is why many of our member companies are voluntarily involved in waste recovery and reduction programs, and support recycling where it is economically and logistically feasible.

We believe policies designed to impact the waste stream should be consistent among states so as to not create unlevel playing fields with respect to the disposal of products. As currently drafted, we are greatly concerned that S. B. No. 89 would enact significant hurdles for producers, have the potential to jeopardize manufacturing jobs in Connecticut, and ultimately even hurt Connecticut consumers if the possible effects of the bill's proposed mandates are not thoroughly considered.

We would sincerely appreciate having the opportunity to not only discuss with you our concerns, but to share with you information about the product management programs that our members currently administer, for the benefit of the environment.

Sincerely,

DANIEL J. CONNELLY
Executive Director

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