



TESTIMONY OF ERIC J. BROWN
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CONNECTICUT BUSINESS & INDUSTRY ASSOCIATION
before the
ENVIRONMENT COMMITTEE
March 22, 2013

Good morning. My name is Eric Brown and I serve as director of energy and environmental policy with the Connecticut Business & Industry Association (“CBIA”). On behalf of our 10,000 large and small member companies throughout Connecticut, we appreciate this opportunity to share our perspective on:

S.B. 6653: AN ACT CONCERNING DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION REGULATORY STREAMLINING TO ASSIST MUNICIPALITIES

With the exception of Section 11, CBIA supports this bill and requests that

Section 11 be deleted from the bill prior to approval.

CBIA appreciates the interest of this committee and the Department of Energy and Environmental Protection’s interest in streamlining the agency’s policies and procedures, and we support the majority of this bill.

However, Section 11 would, in the long run, be counter this goal. This section seeks to modify part of the package of major regulatory reform measures passed just a few years ago and with the approval of this committee.

One of the key principals underpinning that package of reforms was the need for DEEP to move towards a “performance-based” approach to permitting. This means that DEEP’s permitting and enforcement programs are much more efficient when focused on developing the discharge/emission standards that will be allowed from the permitted

activity as well as the permittee's compliance with those standards, rather than using limited agency resources to review the detailed engineering plans and specifications of how the permittee intends to achieve those standards.

CBIA understands that the original deadline for DEEP to adopt regulations establishing minimum design standards, above which a detailed engineering review would not be required, may have been too aggressive and we are open to that date being pushed out to 2014. However, neither the legislature nor DEEP should reduce its commitment to becoming a more efficient agency by adopting more "performance-based" strategy within its permitting programs.

Accordingly, CBIA respectfully requests this committee delete section 11 of this bill S.B. 6653 prior to approval.

CBIA appreciates this opportunity to provide testimony on this bill and for your consideration of our position.