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**Testimony From the Housatonic Resources Recovery Authority (HRRA),
Supporting the Concept of RB 6597,
An Act Establishing a Household Battery Recycling Stewardship Program,
For the Environment Committee Public Hearing, March 11, 2015**

Chairmen Kennedy and Albis, Ranking Members Chapin and Shaban, and members of the Environment Committee, thank you for the opportunity to present this testimony from HRRA, a regional solid waste and recycling management authority for the eleven western Connecticut municipalities of Bethel, Bridgewater, Brookfield, Danbury, Kent, New Fairfield, New Milford, Newtown, Redding, Ridgefield and Sherman with a population of 225,000 residents, in regard to RB 6597. Our municipalities and their Chief Elected Officials strongly support the concept of adopting an all battery stewardship program in the State of Connecticut as does the management of Duracell whose national headquarters is located in our region.

Both our Director and Assistant Director, Jen Iannucci and Cheryl Reedy, attended the two day national battery stewardship dialogue meeting organized by the CT Department of Energy and Environmental Protection and facilitated by the Product Stewardship Institute in June 2014. At this dialogue we were able to meet with all the major battery manufacturers in the United States, both for single use and rechargeable batteries, and work together cooperatively on an outline of model legislation for an all battery bill to be introduced in Connecticut in this session. After that our Assistant Director continued to meet with representatives of the CT DEEP and battery manufacturers to further develop model legislation. Unfortunately, despite all parties wanting to reach the same end goal, we differed along the way, mostly on issues of implementation and oversight, and the battery manufacturers decided to go it alone on the proposed legislation. Thus we support the concept of this legislation, but not this particular bill.

To best serve our communities, we believe that a battery recycling stewardship bill should include, at a minimum, the following:

- Conventional use of terminology so as not to be confusing. For example, in the battery industry and recycling community, "primary" battery refers to a single-use battery as distinguished from a rechargeable battery. The proposed legislation uses the term primary to refer to all consumer batteries, both single use and rechargeable, which is confusing.
- Legislation should cover all batteries, both primary and rechargeable, from as many sources as are technically, politically and economically feasible, including household, business and industrial use. The exception in the proposed legislation for business and industrial batteries is unnecessarily limiting. The exception in the proposed legislation for batteries that are not "easily removable", however, seems appropriate.
- Municipal transfer stations, regional household hazardous waste programs and other municipal agencies want to offer all battery recycling to the public they serve. To do that, the program must be absolutely cost free to municipalities; all must be allowed to participate, but their

participation must be voluntary; all types of batteries (both primary and rechargeable) must be accepted in the same program; and the program must be easy to implement and operate.

- For the paint and mattress stewardship programs, there is one stewardship organization, and that works quite well for municipalities and solid waste regions. Even if batteries might require more stewardship organizations for some reason, a maximum of three to five seems more reasonable and manageable than an unlimited number as the proposed legislation allows. If local transfer stations are to participate as collection sites, the program has to be easy to implement. Too many stewardship organizations will limit municipal participation by increasing complexity.
- A battery stewardship program must be convenient for consumers. However, the legislation itself does not have to contain a specific convenience standard since convenience may change over time as the program matures. The convenience standard contained in the proposed legislation (a minimum of seven collection sites per county) does not provide the kind of convenience and accessibility that consumers need and would not result in a successful program.
- Consumer convenience is also best served by the provision for both battery drop off at collection sites and voluntary curbside collection of batteries by solid waste collectors at no additional cost to their customers, as this legislation proposes. Consumers statewide have embraced the ease and convenience of single stream recycling. The greatest number of batteries will be collected for recycling if a battery stewardship program is somehow tied to single stream recycling and regular curbside collection.
- Practically speaking the state's cost of administering a battery recycling stewardship program should be minimal so that the program can be maintained even during lean budget years, which seems to be all budget years in Connecticut!
- A battery recycling stewardship program must contain performance goals for the stewardship organization(s) that are measured and improved, at least annually. Those goals can include consumer convenience and accessibility, program cost, standards for recycling, number of collection sites, recycling rate, recycling hierarchy used, etc. The legislation itself should not contain the performance goals since they will change over time as the program matures. To be effective, DEEP must have the authority to determine the performance goals for the program on an ongoing basis as well as whether a stewardship organization(s) is meeting those performance goals. DEEP also needs the ability to take appropriate action if a stewardship organization is not meeting the performance goals set for the program.

These are some of the issues and concepts that are most important to us in a battery recycling stewardship program and the legislation necessary to implement it. Our bottom line position, however, is that we fully support the concept of an all battery stewardship program for Connecticut, but ask that the battery manufacturers re-engage in working with DEEP, retailers, municipalities/regions, and others to revise this proposed legislation into a bill that all stakeholders can support.

Thank you.

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