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## **Environmental Committee Testimony**

**By Stan Sorkin, President**

**Connecticut Food Association**

**Wednesday, March 11, 2015**

**Testimony Regarding H.B. No. 6957**

Chairman Albis, Chairman Kennedy and Members of the Environmental Committee. My name is Stan Sorkin, President of the Connecticut Food Association. I am testifying in concerning **H.B. No. 6957: An Act Establishing a Household Battery Recycling Stewardship Program**

The Connecticut Food Association is the state trade association that conducts programs in public affairs, food safety, research, education and industry relations on behalf of its 240 member companies—food retailers, wholesalers, distributors, and service providers in the state of Connecticut. CFA’s members in Connecticut operate approximately 300 retail food stores and 135 pharmacies. Their combined estimated annual sales volume of \$5.7 billion represents 75% of all retail food store sales in Connecticut. CFA’s retail membership is composed of large multi-store chains, regional firms, and single store independent supermarkets. CFA’s 90 associate members include the supplier partners of its retail and wholesale members. Our goal is to create a growth oriented economic climate that makes Connecticut competitive with surrounding states.

The Connecticut Food Association supports the concept of a Household Battery Recycling Stewardship Program. We realize that the prime responsibility for implementing such a plan is that of the battery manufacturers and those retailers offering private label batteries.

We, however, have some concerns regarding the timing of the implementation of the bill. Vermont was the first state to pass Battery Stewardship legislation in 2014 and the Connecticut bill mirrors that legislation. The Vermont bill will soon be implemented. We believe in “Creative duplication” and thus request that Connecticut delays the passage of this bill until we can best learn from the implementation results- both good and bad- from Vermont’s experience with the law.

Our concern is the ability of a qualified “Primary battery stewardship organization” to be set up and functioning by the required dates. Just as Connecticut passed organic waste recycling legislation to stimulate more facilities to locate in the state, we are still waiting, two years later, for new facilities to come on line.

Although convenient, due to RCRA laws, supermarkets would be reluctant to be a collection facility for the household batteries. The “weight” guidelines outlined in federal Resource Conservation and

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Recovery Act (RCRA) would classify supermarkets as “high quantity hazardous waste generators” subject to high dollar fines, if they were to become collection points.

We also have questions regarding the definition of a primary battery producer, and if supermarkets are incorporated or exempt? If a store purchases batteries from a corporation in Texas and imports them into Connecticut, are they then a producer and subject to many sections of the bill? If that is the case, we may be forced to purchase batteries from a CT producer which could be very difficult to find.

We also have concerns about the language in Section 16 of the bill which establishes a fine up to \$500 on each battery if a person discards batteries in mixed municipal solid waste and not through the stewardship program. Are we creating a “battery police” to shift through our recycling bins to find violators and add to Connecticut’s revenue stream? We recommend this Section be eliminated.

In conclusion, we ask that Connecticut review and evaluate the Vermont implementation and make adjustments to the bill prior to enacting H.B. No. 6957.