



Connecticut Product Stewardship Council

Members of Environment Committee, thank you for the opportunity to present testimony from the Council about ***RB 6597, An Act Establishing a Household Battery Recycling Stewardship Program***. The Council supports the establishment of a Product Stewardship Plan for household batteries, just not **RB 6597**. Such a Plan would build on Connecticut's successful existing Stewardship programs for electronics, paint, and soon (this spring) mattresses.

Currently Connecticut's spent batteries are largely ending up in the trash. No recycling option existing for primary batteries (alkaline). The recycling program for rechargeable batteries is only recycling about 15% of available batteries nationwide. Our State held a dialog with stakeholders in June 2014, including the DEEP, municipal governments and the battery manufacturers. Product Stewardship for batteries (of all types) is a great idea: they would be altered from a non-recycled, trash item into a recycled resource.

However, RB 6597, fails to address several important issues that negatively affect its ability to be a viable Stewardship Program. Household Batteries will not be properly addressed through this proposed legislation.

- ✓ RB 6597's use of definitions contradicts industry standards: primary batteries are single use only, such as an alkaline flashlight battery. Here the terms rechargeable and primary are used interchangeably.
- ✓ The majority of towns in Connecticut have transfer stations; these facilities, along with our robust haz-waste programs should incorporate batteries, at no cost to participants.
- ✓ All sources of spent batteries, - residences, businesses and industries should be included in product stewardship legislation.

- ✓ The number of steward organizations must be limited for **any** stewardship program to be effective. For example, Connecticut's successful paint program uses just one, Paintcare.
- ✓ Spent batteries cannot be serviced by traditional curbside recycling systems. Thus to provide convenience and a robust capture rate, locations providing battery acceptance must be commonplace and readily available.
- ✓ The administrative oversight of a Battery Product Stewardship Program must be weighed and have reasonable costs. Here again, Connecticut's years of experience with stewardship programs for other materials can provide guidance.
- ✓ A battery stewardship plan must incorporate performance goals. Otherwise we can't measure success and there are no goals.

In closing, the Council supports the Concept of Product Stewardship legislation for Batteries, just not RB 6597.

Winston Averill
Connecticut Product Stewardship Council
CTPSC.org

