



LAKIN TIRE EAST, INC.

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Testimony of David Greenstein, Vice President Lakin Tire East

RAISED SENATE BILL No. 869 (RAISED) AN ACT ESTABLISHING A TIRE STEWARDSHIP PROGRAM

Chairman Kennedy, Chairman Albis, Senator Chapin, Representative Shaban, members of the committee,

My name is David Greenstein I am a Vice President of Lakin Tire East located in West Haven, CT and I am here today to testify in opposition to Senate Bill 869, An Act Establishing a Tire Stewardship Program.

Lakin Tire has nearly 100 years of leadership and in-depth experience in the scrap tire industry; we provide safe, smart removal and recycling of scrap tires. Lakin Tire East has made substantial investments in state of the art technology and equipment. We have operated in Connecticut since 1979. We currently employ approximately 200 people at our West Haven facility and occupy nearly 100,000 square feet of warehouse and office space. Lakin Tire has recycled over 30 million CT sourced scrap tires in the past 35 years.

My testimony is fairly straight forward. I share the Department of Energy and Environmental Protection's goal; to ensure that scrap tires are disposed of in the most efficient and environmentally responsible way. I believe that the existing tire recycling industry in Connecticut today, does just that. As someone who has spent a lifetime in the tire recycling business here in Connecticut, I can state confidently that there is not a tire disposal problem in our state. Virtually all tires that are removed from use in Connecticut are picked up at retail tire stores or local garages and brought to a tire recycling processor. While illegal dumping of tires may have been an issue many years ago, it is not a problem in our state today.

I believe an Extended Producer Responsibility program as set forth in SB869 is unnecessary, overly burdensome and most importantly, fraught with unintended consequences. Such as significantly raising the prices of new tires sold in CT. Therefore, incentivizing CT residents to cross our state's borders and purchase tires in neighboring states. Resulting in loss of commerce as well as valuable tax revenue. In addition, with the prospect of offering free tire disposal, CT runs the significant risk of encouraging unwanted influx of scrap tires from other states.



Today, most scrap tires in Connecticut are processed and shipped out of state to be used as fuel in industrial boilers. CT and the entire New England region has successfully relied on Tire Derived Fuel as a responsible means of recycling tires for over 20 years. Lakin Tire shares the DEEP's concern for the need of additional end-use markets. But to mandate the cessation of Tire Derived Fuel will not help create other markets such as crumb rubber. Firstly, there is not a single crumb rubber producer in all of New England. Secondly, crumb rubber producers in other parts of the country have generally struggled financially as the end product is not cost competitive. Tires today are manufactured robustly to last upwards of 50,000 miles. Therefore it is easy to understand that to dismantle and separate a tire into its three components of rubber, steel and fiber is quite costly. The result is a product that services a narrow niche market and most often is not competitive in the market place. Lakin Tire does supply feedstock, in relatively small quantities to crumb rubber producers in non-New England states. Nevertheless, Lakin Tire continues to vigorously pursue and research any and all markets for recycled scrap tires.

Lakin Tire is committed to working with the Committee and DEEP to provide you with the information you need to make an informed decision on SB869. I strongly believe that the bill will not improve the current tire recycling system, which is very effective, and may ultimately result in a myriad of unintended consequences.

Thank you for the opportunity to speak with you today, I will be happy to answer any questions you may have.

