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**February 4, 2015**  
**MEMORANDUM OF OPPOSITION**

**Connecticut Raised Bill No. 6033, AN ACT CONCERNING THE  
INCLUSION OF JUICES, TEAS AND SPORTS DRINKS UNDER  
CONNECTICUT'S BOTTLE BILL**

On behalf of the Grocery Manufacturers Association (GMA), I would like to take this opportunity to register our opposition to Raised Bill No. 6033, An Act concerning the inclusion of juices, teas and sports drinks under Connecticut's Bottle Bill. The Grocery Manufacturers Association and its member companies continues to believe that mandatory deposit systems are costly, inefficient and targeted at a narrow segment of the solid waste stream. This legislation, which would expand the current beverage container deposit program to include juices, teas and sports drinks, would be a regressive cost increase for grocery consumers and would not promote conservation or a clean environment more efficiently than curb-side recycling.

Based in Washington, D.C., the Grocery Manufacturers Association is the voice of more than 300 leading food, beverage and consumer product companies that sustain and enhance the quality of life for hundreds of millions of people in the United States and around the globe.

Founded in 1908, GMA is an active, vocal advocate for its member companies and a trusted source of information about the industry and the products consumers rely on and enjoy every day. The association and its member companies are committed to meeting the needs of consumers through product innovation, responsible business practices and effective public policy solutions developed through a genuine partnership with policymakers and other stakeholders.

In keeping with its founding principles, GMA helps its members produce safe products through a strong and ongoing commitment to scientific research, testing and evaluation and to providing consumers with the products, tools and information they need to achieve a healthy diet and an active lifestyle.

The food, beverage and consumer packaged goods industry in the United States generates sales of \$2.1 trillion annually, employs 14 million workers and contributes \$1 trillion in added value to the economy every year.

**GROCERY MANUFACTURERS ASSOCIATION**

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GMA believes that further expansion of the bottle deposit program is a costly, inefficient and inconvenient means of attempting to increase recycling. The existing beverage container redemption system inefficiently targets a very small segment of the overall solid waste stream. Beverage containers account for a small fraction of litter (8.5% on average) and expansion to new beverage containers will have a minimal effect on litter. In fact, noncarbonated beverage containers account for less than 1.4% of total litter. Connecticut consumers have also demonstrated a habit of throwing redeemables in with recyclables. The majority of bottled beverage containers are disposed of at home or at work, where the easiest way to capture and recycle those containers is by providing recycling bins at those locations. It should also be noted that the cost per ton of material recycled is typically three times higher in a deposit/redemption system than in a comprehensive curbside program.

In fact, the current system has a low participation rate with millions of cans currently not being returned or redeemed--even with deposits on those bottles and cans. The state's own Office of Policy Management estimated several years ago that there were then \$20 million in unclaimed bottle deposits – that means 400 million cans were NOT being redeemed even before the expansion to waters. People are curbside recycling these containers, not redeeming them. Consumers who do not redeem their containers cite the nuisance, inconvenience, and mess as factors against bringing containers back. However, people are already recycling these beverage containers and other packaging not covered by this legislation even without a deposit by utilizing their access to curbside recycling. Adding bottle deposits to more containers will not incentivize these consumers to redeem, it simply amounts to another tax the consumer must pay even as they grow more likely to recycle at curbside.

GMA believes that the state should carefully evaluate and assess the true environmental costs of expanding this redemption center-based program, including the impact on energy consumption and emissions from consumers making trips to redemption centers vs. placing recyclable containers in their curbside bins. Furthermore, the potential reduction in curbside recycling which is a likely unintended consequence of this legislation should the legislation lead to its intended consequence of more material being brought to redemption centers, will only increase the cost of such programs to taxpayers. Municipalities use the sale of collected materials to offset collection costs, and the likely loss of material currently destined for convenient locally supported curbside recycling programs, could lead to a phase out of such programs, which could discourage consumers from recycling at all. Research shows that convenience and simplicity are keys to increasing recycling participation (e.g. single stream recycling).

AMERIPEN, the American Institute for Packaging and the Environment, examined the best practices for recovery of used packaging across the nation's 100 largest cities and their correlation to the efficiency and effectiveness of existing curbside recycling systems. This research shows that Pay As You Throw (PAYT) and unit-based trash

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pricing mechanisms, mandatory recycling, and disposal bans have the potential to drive consumer behavior toward recycling and improve the recovery rates of used packaging. By setting recycling goals, communities have additional support to drive new programs and improve performance. These programs, coupled with state-level recycling goals and municipal efforts to educate and incentivize consumers can have a significant impact on diverting material from landfills. When education, policy, incentives, and new infrastructure, such as rolling carts, consumers take notice. Deploying carts for example can grow curbside collection by as much as 60%.

Finally, it should also be noted that the increased volume and variety of containers to be redeemed will also have an impact on retailers who must take up scarce retail floor space to collect and store refuse. This is both costly in lost revenue and can contribute to sanitation challenges that must be addressed by the retailer. A litter program or a statewide, comprehensive curbside recycling program will better serve the goals of environmentalists for a cleaner landscape without unduly and unfairly burdening grocery stores and consumers. A litter program or a statewide, comprehensive curbside recycling program will better serve the goals of environmentalists for a cleaner landscape without unduly and unfairly burdening grocery stores and consumers

For these reasons, GMA respectfully asks for your NO vote on Raised Bill 6033. Thank you for your attention and consideration of our position and I welcome any opportunity to continue this discussion.

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