



Connecticut Department of
**ENERGY &
ENVIRONMENTAL
PROTECTION**

**STATE OF CONNECTICUT
DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION**

Public Hearing – February 13, 2015
Environment Committee

Testimony Submitted and Presented by Commissioner Robert J. Klee

Raised Senate Bill No. 869 - An Act Establishing a Tire Stewardship Program

Thank you for the opportunity to present testimony regarding **Raised Senate Bill No. 869 - An Act Establishing a Tire Stewardship Program**. The Department of Energy and Environmental Protection (DEEP) welcomes the opportunity to offer the following testimony.

We appreciate the Committee's willingness to raise this bill at the request of DEEP. This proposal, which DEEP strongly supports, proposes an effective way to increase the recovery of discarded tires, while creating jobs related to their beneficial reuse and virtually eliminating the illegal dumping of tires. This proposal would create an extended producer responsibility ("EPR") program for the management of discarded tires in Connecticut. Under this bill, the tire industry would assume responsibility for managing the entire lifecycle of their product, by creating a plan to ensure the collection of used tires at the end of their useful life, which would then be submitted to the DEEP for approval. The plan would outline a process for establishing an efficient collection and recycling system to recover the value in discarded tires and, in the process, facilitate the development of additional tire recycling businesses in Connecticut.

DEEP views producer responsibility programs as an important strategy component of managing the state's solid waste in a way that captures greater value from the waste stream and reduces the amount of material being sent to resource recovery facilities. The state's solid waste management plan, last amended in December 2006, identifies product stewardship approaches as an effective tool for furthering our recycling goals. Product stewardship programs acknowledge that consumers, government and manufacturers all have an important responsibility in advancing the best management of products at the end of their useful life. Our experience with the very successful e-waste and paint stewardship programs has affirmed our belief in EPR as an important tool in materials management, as well as for reducing municipal costs associated with historical disposal practices using curbside collection and/or municipal transfer stations.

Illegal tire dumping continues to be a problem in Connecticut and is an ongoing management and enforcement problem and cost for municipalities. Illegal scrap tire dumping is often a low enforcement priority for law enforcement officials, and river and roadside dumping and accumulations of tire piles continues to be a significant problem. For example, the Connecticut River Watershed Council reported retrieving 464 illegally dumped tires from the Connecticut segment of the Connecticut River watershed on a single clean-up day. Unfortunately, we know that unscrupulous individuals and businesses accept tires from

unknown generators at below market rates, cull out the tires that have resale value, and illegally dump the rest. Illegally dumped tires also pose additional concerns, because they provide an ideal breeding ground for mosquitoes and can also present a fire hazard.

Effective product stewardship programs limit the role of government to that necessary to ensure appropriate assignment of responsibility and creation of fair and effective programs for the responsible handling and reuse of wastes. Similar to our paint and mattress stewardship programs, manufacturers would take responsibility for the collection, transportation and recycling of the tires through an industry-run stewardship organization that coordinates services, payments and manages the overall system. We believe this approach provides a greater degree of control for manufacturers, and creates a convenient and readily accessible program for Connecticut residents and businesses.

Connecticut faces the challenge of providing a better approach to managing approximately 3.5 million scrap tires each year. Establishing a tire stewardship program is an effective way to deal with this waste stream, reduce enforcement and disposal costs to our municipalities and state agencies, increase more beneficial reuse and recycling while making it easier for consumers to be a part of the solution. The State of Vermont is pursuing similar legislation this year.

DEEP has learned from other recently enacted stewardship programs in Connecticut that businesses and jobs are created, and municipalities save money. For example, the 2014 e-waste report¹ notes that, as of last year, the e-waste stewardship program has resulted in the recycling of over 25 million pounds of electronics, the creation of 37 jobs, and savings of over one million dollars for municipalities. The more recently enacted mattress stewardship law has already resulted in the development of two new recycling businesses in Bridgeport and East Windsor. Section 2(d) of this proposed bill strongly embraces the waste management hierarchy, which prefers (when possible) reuse and recycling of tires over energy recovery or landfill disposal. Generally, reuse and recycling creates more jobs than energy recovery, and with more tires potentially entering reuse and recycling systems as a result of this proposed bill, entrepreneurs may develop new tire processing facilities and expand markets for products containing recycled tires.

In summary, DEEP strongly supports **Raised Senate Bill No. 869 - An Act Establishing a Tire Stewardship Program** as an effective way to increase the recovery of discarded tires, create jobs, and eliminate illegal dumping. In the process of developing this proposal DEEP convened a national dialogue of interested stakeholders to discuss the challenge of managing scrap tires and the Department is willing to continue to work with municipalities and the industry to further develop a plan for the implementation of this program, in a way that ensures that the program is run efficiently and limits government's role.

Thank you for the opportunity to present testimony on this proposal. If you should require any additional information, please contact Robert LaFrance, DEEP's Director of Governmental Affairs, at 860.424.3401 or Robert.LaFrance@ct.gov (or, Elizabeth McAuliffe, DEEP Legislative Liaison, at 860.424.3458 or Elizabeth.McAuliffe@ct.gov).

¹ http://www.ct.gov/deep/lib/deep/e-waste/2014_e-waste_annual_report_final.pdf