



# TOWN FAIR TIRE CENTERS, INC.

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## **RAISED BILL NO. 869, AN ACT ESTABLISHING A TIRE STEWARDSHIP PROGRAM (LCO NO. 3333). STATE OF CONNECTICUT, GENERAL ASSEMBLY**

Testimony of Daniel D. Rubino, Town Fair Tire Centers, Inc.

Public Hearing: February 13, 2015

Chairman Kennedy, Chairman Albis, Senator Chapin, Representative Shaban,  
Members of the Committee,

My name is Dan Rubino. I am Counsel to Town Fair Tire Centers, Inc., as well as part of the Business Development and Strategic Initiatives Division of the Company. I am here today to testify on behalf of Town Fair in opposition to Bill 869, An Act Establishing A Tire Stewardship Program.

Town Fair is the largest independent retail tire dealer in the State of Connecticut, with over 34 locations throughout Connecticut and over 50 additional locations throughout New England. We are headquartered at 460 Coe Avenue, East Haven, Connecticut 06512, have more than 660 employees in Connecticut, and have been in existence for more than 50 years. Our warehouse facilities consist of more than 360,000 square feet of space in East Haven and West Haven.

Together with other tire retailers in Connecticut, we constitute a significant part of the overall supply chain of new tires to, and receipt of used tires from, consumers and businesses in the State. Integral parts of the tire "life cycle" -- used tire collection, disposal, recycling and "end-of-life" tire waste management -- have been fundamental aspects of our business since the beginning.

The State of Connecticut is fortunate. Connecticut does not have a tire waste, disposal or recycling problem.

Connecticut currently has a market system for tire disposal and recycling that *works, and works quite well*. It represents a highly functioning and disciplined "stewardship" type system, resulting in participants in the tire life cycle taking ownership in and responsibility for the safe, smart and environmentally sound disposal and recycling of scrap tires.

Connecticut's current market system is established, efficient and economical. It accomplishes the goals and objectives of all stakeholders -- ensuring safe, effective, and environmentally sound methods of used tire disposal and management for the benefit of consumers, businesses, and the government.

It accomplishes these goals and objectives:

- Without a Government bureaucracy or a Government mandated monopoly.
- Without Government imposed fees, levies, or taxes on Connecticut residents.
- Without ever running a deficit.
- Without the need for State or Local Government subsidies.

The proposed program included in Bill 869 will result in the reversal of the progress and the advances made by and for the benefit of all Connecticut stakeholders. It would mandate and force a new, unwieldy, burdensome, costly, and unlimited bureaucracy in place of an established, efficient and proven tire waste management system that currently exists in Connecticut.

Among other known negative consequences of such a program, tire costs will increase to fund the new system; funding requirements and expense (in the form of fees, levies or taxes) will ultimately be borne by the consumer and residents of Connecticut; business will shift and migrate out of Connecticut and to other States in the Northeast; and scrap tires from other States will find their way into Connecticut, creating an additional problem that does not exist today.

It would be unfortunate to see the waste tire management system - that currently exists in Connecticut today - disrupted, dismantled and destroyed.

We would hope to see markets expand and new markets created for used tires. Indeed, the State and industry should work together to foster such expansion and creation of markets. That, however, is a separate and distinct issue, and is neither accomplished nor addressed by Bill 869.

While the efforts of the Committee in presenting the Bill 869 should be applauded, we respectfully request that, for the reasons mentioned, the Bill not be approved and that the current Connecticut system be allowed to continue and flourish -- best serving Connecticut residents and the Connecticut environment.