

Senator Kennedy, Rep Albis, Sen. Chapin, Rep Shaban and members of the Environment Committee, I am Tim Phelan and I am the President of the CT Retail Merchants Association. CRMA is a statewide trade association that represents some of the world's largest retailers and the state's main street merchants. I am here today to testify **in opposition to SB 869, AA Establishing a Tire Stewardship Program.**

We oppose this bill for the simple reason that it is unnecessary. As you will see from the testimony of one our member companies, Town Fair Tire of East Haven CT, there already is already in place an industry created and driven tire recycling program that tire retailers and their customers use.

That program is an effective one that takes a market approach to the issue and the results are an efficient and economical system that accomplishes the goals of all the stakeholders involved without adding any additional costs to consumers and retailers.

CRMA has had extensive experience in these so called stewardship issues and as we have said in all of them, from electronics, to paint, to mattresses - one size does not fit all. And the devil is in the details.

What might work for paint may not work for mattresses and may not work for electronics or for the next product. In fact we question when the product list will end.

And we have argued that IF a system is in place that has worked for a particular product that there is not a need to create a new government program, like what is proposed in SB 869.

So that is why in this case, we oppose this bill. Why are we considering creating a NEW system for tire disposal when the industry directly impacted has reacted by creating their own program without the government bureaucracy and increase cost to our members?

For the retail industry our biggest concern in all product stewardship legislation comes down to a few issues: Is the program needed? What impact will a solution to that problem have on our customers and our members? Will the result of that solution increase cost that will hurt brick and mortar business with no real benefits?

As we have mentioned, our members who sell tires currently have a solution which does not impact their customers with any additional fees which would be the case with the type of stewardship program laid out in SB 869, and does not impact their administrative costs to collect and remit that fee to a newly created organization.

We are hopeful the Committee will take our thoughts into consideration on this particular recycling issue and not move forward with this bill.

Thank you for your time and we would be happy to continue this discussion and to continue to work with the committee.