

**Testimony
for the
Environment Committee
of the
Connecticut Legislature
on
House Bill # 5149**

**Friday, February 19, 2016
Hartford, CT**

Submitted by

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Good morning Senator Kennedy; Representative Albis; and members of the Environment Committee. Thank you for the opportunity to testify. We will take this opportunity to express the following concerns, from Connecticut's hauling and waste and recycling industry, about this extended producer responsibility proposal for after useful life management of tires that is before you today.

CTs hauling industry every day moves a variety of after useful life materials, recyclables and wastes. We move these materials in a variety of ways -- often as dedicated material loads and often as assorted material loads. The discarded materials we collect are generated by the citizens, communities and businesses of the state. It is they who place these materials in the receptacles, barrels or containers our employees routinely collect. And, we endeavor vigorously and diligently all the time with these CT generators -- as our customers -- to make sure they understand all appropriate CT rules and regulations for the management their discards.

Once these materials are gathered and put in our collection vehicles, they are hauled to appropriate facilities for handling and disposition. Once we arrive at the facility and empty -- or tip our load -- it is then that we then have the opportunity to view what was actually discarded and placed in the system by our customers. If at this point of the process an errant item -- like a tire -- is found in the load upon inspection, we do not believe a fine or violation should be imposed on the hauler by the DEEP -- or by any new extended producer responsibility tire program rule -- that CT might establish.

The CT chapter of NWRA supports making sure that discards and waste materials generated by all in the state are collected properly and delivered to appropriate permitted facilities for prescribed handling. We do not support, and have never supported, the improper management of these discards and materials that might cause environmental harm, or any threat to the health and safety of the public. And, to the extent the loads we collect, after working in good faith with those who generate them, are found to have any errant discard or improper materials in them, we believe it most appropriate the collection company be held harmless and not be penalized due to the acts of the generator.

We also believe that the extended producer responsibility proposal for tires before you today might trigger the imposition of yet a new, and what we believe to be a redundant, state registration requirement for the state's waste and recycling companies – both haulers and facility operators -- since we haul tires errantly in our loads from time to time and since they are sometimes delivered to our facilities. We do not support, and encourage you to reject, imposing another material specific registration or license on CT haulers and facility operators since we already are required to have multiple registrations in the communities and regions we serve and at the public or special purpose facilities we use.

We look forward to continue to both do our job responsibly and pledge to share our knowledge, thoughts and views with the committee on all waste and recycling issues facing CT citizens, communities and businesses.

The CT chapter of the National Waste and Recycling Association represents the private taxpaying waste and recycling haulers and companies that work in CT every day to responsibly manage the after useful life discards, materials, recyclables and wastes generated by its citizens, communities and businesses. We believe in strong, sustainable environmentally responsible programs that are run with the efficiency and expertise that comes from a competitive and robust private marketplace that provides and innovates these services routinely.