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**Housatonic Resources Recovery Authority Testimony on RB 232, RB 233, RB 226, and RB 5385
Concerning Batteries, Packaging, Plastic Bags and Materials Management Programs.
Environment Committee Public Hearing
Friday, March 4, 2016**

Sen. Kennedy, Rep. Albis, Sen. Chapin, Rep. Shaban and Members of the Environment Committee:

I am Jen Iannucci, Director of the Housatonic Resources Recovery Authority (HRRA), the regional governmental solid waste and recycling management organization for 11 municipalities in western Connecticut, including the Towns of Bethel, Bridgewater, Brookfield, Kent, New Fairfield, New Milford, Newtown, Redding, Ridgefield and Sherman and the City of Danbury. Representatives of each of our municipalities, typically the Chief Elected Official, have reviewed and authorized this testimony to be submitted on their behalf.

The draft Comprehensive Materials Management Strategy (CMMS) was recently released by CT DEEP outlining the actions the Department believes are necessary for the state to achieve the 60% solid waste diversion goal by 2024. The CMMS proposes to meet that goal in three ways:

- Improve municipal recycling programs
- Take advantage of new technology that becomes available
- Make producers more responsible for the end of life management of their products

Once adopted the CMMS becomes the plan that municipalities must follow in dealing with the solid waste and recycling generated within their borders. Our municipalities, like others across the state, want to do their part but cannot afford to bear the financial burden alone of meeting the 60% diversion goal. To that end we support programs that limit municipal costs, that limit total costs, and that ensure that the more leftover material a person produces or the more expensive the material is to get rid of, the more people should pay for the costs of handling that material at the end of its life.

RB 226 – An Act Concerning Single-Use Carryout Bags – HRRA opposes this proposed bill. We believe that legislation affecting single-use bags, which are mostly made of plastic film, should seek to reduce the quantity of such bags. This legislation tries instead to change the composition of such bags over time. The litter caused by plastic bags that find their way into our landscapes, rivers and streams is not only unsightly but costs scarce municipal dollars to clean up and dispose of each year. In addition, these bags get mixed into our region's single stream recycling by unknowing residents, cause machinery breakdowns at our regional MRF which are costly to repair, and ultimately reduce the rebates that recyclers are able to afford to pay to our municipalities.

As members of the Product Stewardship Institute and the CT Product Stewardship Council, the Authority and our municipalities would support an extended producer responsibility (EPR) program to collect and recycle all types of packaging, including, but not limited, to single-use bags and all other types of plastic film at the end of life. As part of that process, all stakeholders need to be involved in development of a program including packaging manufacturers, retail outlets (not just grocery stores), solid waste collectors, MRF operators, transfer station operators, film recyclers and municipalities to name a few.

RB 232 – An Act Concerning the Recycling of Consumer Household Batteries - HRRA opposes this bill. The draft bill is very disappointing to us after all the work our staff has done in the past few years to

work with the battery industry, our legislative delegation, CT DEEP, CT PSC and PSI on extended producer responsibility legislation for all batteries. This draft bill is not an EPR bill. Our region is home to the corporate headquarters of Duracell, one of the big three battery manufacturers in the country, a supporter of an all-battery EPR bill for CT, a founding member along with Panasonic and Energizer of the Corporation for Battery Recycling in 2011, and a founding steward of Call2Recycle in 1994, a voluntary, industry-created, rechargeable battery stewardship program in which all our communities participate.

Adding household batteries to the state's mandatory recyclable list and making municipalities responsible for providing battery recycling to residents won't work. The recycling in our region is collected curbside as single stream, and the MRF where our single stream recycling is processed is not technically capable of separating batteries from other material in the single stream. Batteries will end up as a waste byproduct at the MRF, costing the MRF and municipalities more money. Creating another municipal mandate and adding costs to municipalities is the last thing the legislature should be doing right now, especially when there is another, more viable alternative available for responsibly dealing with batteries at their end of life, and an industry united, ready and willing to take on a program to do just that.

We support the CT Product Stewardship Council's proposal to move forward with a program that is modeled after [Maine's proposed battery EPR bill](#), but also includes:

- Both primary and rechargeable batteries,
- All battery containing products with batteries that are easily removed by the consumer,
- Both residential and business use batteries,
- Convenience standards for the public,
- Performance standards for the program,
- Public comment on the proposed stewardship plans before adoption, and
- Private right of action for the battery industry against free riders that could threaten the entire program.

RB 233 An Act Concerning a Reduction of Consumer-Based Packaging Materials – HRRRA supports the concept of this bill but would like to see the proposed study by DEEP expanded to include:

- Printed paper as well as all packaging, i.e. most of the items currently found in single stream bins,
- Involvement of all stakeholders, including municipalities and haulers, not just the packaging industry,
- Both residential and commercial packaging and printed papers,
- Production of an action plan for implementation of a packaging and papers EPR program, and its cost savings to municipalities.

We also agree with the comments of others that it makes sense to consider adopting product stewardship framework legislation so that it would not take so long to add to the state's EPR arsenal. Framework legislation establishes an overarching product stewardship policy and streamlines the process of creating product stewardship laws making it more likely to achieve the statutorily mandated 60% solid waste diversion by 2024.

RB 5385 An Act Concerning the Department of Energy and Environmental Protection's Materials Management Programs – We support this bill that would modify existing law to make it easier for DEEP to permit new technology that may come along to dispose of MSW and/or organics in a way that is consistent with the CMMS as well as the state's climate change policies.

We thank you for the opportunity to offer our comments on these four bills and look forward to working with the Committee to meet our mutual goals and meet the 60% diversion rate by 2024 or sooner.