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Testimony of Kristin Power, Vice President, State Affairs  
Consumer Specialty Products Association  
Submitted to the Environment Committee  
March 4, 2016

### **Senate Bill 233: An Act Concerning A Reduction of Consumer Based Packaging Materials**

Senator Kennedy, Representative Albis and members of the Environment Committee:

Thank you for the opportunity to submit written testimony. On behalf of the Consumer Specialty Products Association, I offer the following comments on Senate Bill 233, which would amend the state-wide solid waste plan.

The Consumer Specialty Products Association (CSPA) is the premier trade association representing the interests of companies engaged in the manufacture, formulation, distribution and sale of more than \$80 billion annually in the U.S. of familiar consumer products that help household and institutional customers create cleaner and healthier environments. CSPA member companies employ hundreds of thousands of people globally. Products CSPA represents include disinfectants that kill germs in homes, hospitals and restaurants; air fresheners, room deodorizers, and candles that eliminate odors; pest management products for home, lawn and garden, and pets; cleaning products and polishes for use throughout the home and institutions; products used to protect and improve the performance and appearance of automobiles; aerosol products and a host of other products used every day.

#### **General Principles**

As a matter of policy, CSPA encourages consumers to minimize waste by using the following strategies before considering disposal options:

- Buy only what is needed;
- Use up products or give them away to someone who can; and
- Recycle empty containers.

In situations where such action is not feasible, consumers are encouraged to dispose of leftover products in an appropriate and environmentally responsible manner. In many cases, manufacturers provide guidance for appropriate disposal options.

CSPA supports the shared goal of responsible waste management but believes that any measures and regulations to achieve the goals of SB 233 must be viewed through the lens of the economy, job creation and job retention. Concepts to achieve the state's goal should avoid onerous and excessive mandates that will lead to increased costs for business and ultimately consumers. Goals should focus on incremental and achievable efforts without inflicting harm to the state's economy. We believe solid waste management plans should at a minimum incorporate implementation concepts and policy recommendations that are:

- Cost-effective;
- Technologically feasible, and

- Environmentally beneficial.

It is also important that concepts to achieve the goals of SB 233 provide businesses with flexibility in order to achieve environmental gains in waste management. Policy guidance designed to provide flexibility is more aligned with implementation realities, and will help make achieving the state's environmental goals much more feasible.

### **Manufacturer Stewardship Program**

Manufacturer stewardship programs are challenging and an expensive undertaking. Imposing responsibility on the product producer over the entire life of the product ignores the tremendous cost burden and practical compliance challenges of such a program, and ignores the substantially higher costs that a consumer will face as a result. CSPA believes that local governments are in the best position to ensure the proper handling and disposal of municipal solid waste. Local government units should continue to execute this traditional function.

CSPA thinks that consumers should not be forced to pay twice for disposing of household waste. Competitive market forces – not government mandates – are more efficient means to compel manufacturers to reduce the amount of consumer product waste.

### **Packaging Choices**

In most cases, packaging is selected to provide multiple benefits, including protection of the product during transportation; theft deterrence in the retail setting and to facilitate product use. It is critical to acknowledge the basis of these packaging choices and their resulting consumer benefits.

### **Source Reduction**

Manufacturers of products packaged in rigid plastic packaging containers (RPPC) have been partners with the State of California in implementation of that state's RPPC program since 1991. In the subsequent years manufacturers have significantly reduced packaging by reducing container weight and products sold in Connecticut are meeting the RPPC source reduction requirements as manufacturers market nationally.

### **Implementation Costs**

Any proposal should include an assessment of the costs associated with implementing recommended policies. Assessing the overall costs associated with each of the proposed policy drivers is necessary and can be achieved by conducting a thorough economic analysis; one that evaluates cost to business, local government, consumers and other stakeholders.

### **Consumer Involvement**

Consideration of how strategies impact consumers financially as well as the likelihood/ease of consumer participation is an important component of any solid waste management strategy. Any such plan must rely on consumer participation in envisioned activities undertaken by government, manufacturers and retailers. We encourage the State to identify and consider consumer engagement strategies in each of the policy areas. Consumer involvement and buy-in, both as participants in reducing/diverting waste and ultimately as ratepayers/end users, is critical in attaining any recycling goals.

### **Conclusion**

Concepts to achieve the state's goal should avoid onerous and excessive mandates that will lead to increased costs for business and ultimately consumers. Goals should focus on incremental and achievable efforts without inflicting harm to the state's economy. Thank you for the consideration of these comments.