



REMARKS OF  
TOY INDUSTRY ASSOCIATION (TIA)  
*SUBMITTED TO*  
**CONNECTICUT JOINT ENVIRONMENT COMMITTEE**  
CONCERNS REGARDING HB 232  
“AN ACT CONCERNING THE RECYCLING OF CONSUMER HOUSEHOLD BATTERIES”

MARCH 4, 2016

SUBMITTED BY  
OWEN CAINE  
DIRECTOR OF STATE AFFAIRS

[www.toyassociation.org](http://www.toyassociation.org)

Chairman Kennedy, Chairman Albis, Ranking Member Chapin, Ranking Member Shaban and members of Environment Committee, the Toy Industry Association (TIA) appreciates this opportunity to provide testimony on Senate Bill 232, concerning the recycling of consumer household batteries. TIA is the not-for-profit trade association for inventors, producers, importers, and retailers of toys and youth entertainment products sold in North America. The Association represents more than 700 companies – both large and small in size – that account for approximately 85% of domestic toy sales. There are more than 50 toy companies located in Connecticut, and overall the toy industry supports more than 6800 jobs in the Nutmeg State.

The Toy Industry Association appreciates this opportunity to submit our remarks regarding Senate Bill 232. While TIA fully supports the goal of the State providing comprehensive recycling plans, we do believe that the broad language in SB 232 may result in a costly and unworkable system of manufacturers overseeing the collection and recycling of consumer batteries. We request that the committee look carefully at the possible outcomes which could hurt businesses throughout Connecticut.

TIA members produce a wide variety of products that are designed for one primary purpose, to encourage the safe, active play of children. Our products are used to help educate and entertain children throughout Connecticut and the country every day and in countless households. SB 232 could require an unworkable system through unreasonable expectations on manufactures for the reclamation and recycling of consumer household batteries, distracting our industry from its primary goal of ensuring the safe, active play of children.

### **Lifespan of Toy Products**

Children's toys are unique treasures that can have varying lengths of functionality. While some of the toys TIA members produce use batteries, most toys will long outlive the life of one set of batteries. Additionally, toys are often kept by families for many years, possibly even decades after their purchase. Toys are very often then donated, re-gifted, or put into storage. These realities of this unique consumer product make it almost impossible to know when and where a family decides to dispose of a toy, making it almost impossible to determine where and how to reclaim any batteries that might be in the product at the moment of disposal. This actuality means that it would be exceedingly difficult and costly for toy manufacturers to ever be able to reclaim and recycle batteries that are included with their products at the point of sale or required for use during the life of a product.

### **Vermont Battery Recycling Exemption for Imbedded Batteries**

Other states have considered this important issue and even enacted comprehensive battery recycling legislation, like the State of Vermont. Through their legislative and regulatory process they deemed it too complicated and costly to try to reclaim and recycle batteries that are imbedded in consumer products, including toys, at the point of sale. After consideration it was thought to be too much of a burden on consumers, government and manufacturers and thus products with imbedded batteries in them are excluded from their enacted law. We encourage the committee to look into the considerations that the State of Vermont made in developing their battery recycling plan.

On behalf of the more than 700 members of Toy Industry Association, including the toy companies in Connecticut, we thank you for your consideration of these concerns. We respectfully request the

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opportunity to work with you on this legislation to more clearly and efficiently achieve its desired goal. If you or your staff has any questions, please do not hesitate to contact me.

Owen Caine  
Director of State Government Affairs  
(202) 459-0361  
ocaine@toyassociation.org