



Recharging the planet. Recycling your batteries.™

March 4th, 2016

Legislative Office Building, Room 3200
Hartford, CT 06106

Re: Raised Bill Number 232 – Oppose

Dear Co-Chairs Kennedy and Albis, Ranking Members Chapin and Shaban, and members of the Environment Committee,

Call2Recycle® is the nation’s oldest product stewardship program that has been collecting rechargeable batteries in the state of Connecticut for almost 20 years. Call2Recycle® collected nearly 60,000 pounds of rechargeable batteries in the state in 2015 through over 300 collection locations.

I’m here to testify in opposition of Raised Bill Number 232, which would require the Commissioner of Energy and Environmental Protection to amend regulations to add consumer household batteries to the list of designated recyclables. Our organization is solely devoted to collecting and recycling batteries so it pains us to be in opposition to this bill. But it’s vagueness, conflicts with our existing program and the potential burden in might cause municipalities, retailers and other stakeholders has caused us to be in opposition.

Our opposition for Bill 232 centers on the following concerns –

- **Regulatory Process:** The bill assigns the program development to the regulatory process which simply is not prepared to manage the myriad stakeholders required to develop a complex policy.
- **Product Stewardship:** Bill 232, as written, is not a product stewardship bill. As a consequence, it places an unnecessary and unfunded burden on municipalities to collect and recycle batteries.
- **Safety:** Bill 232 would add consumer household batteries to the list of designated recyclables which would require them to be collected with other designated recyclables. Collecting household batteries in this way is not safe and could potentially violates U.S. Department of Transportation regulations governing the safe transport of certain battery types.
- **Inefficient:** The bill covers “non-nickel cadmium” battery chemistries, presumably because we are already fulfilling the mandate under existing Connecticut law to collect nickel cadmium batteries. However, this approach inevitably creates two parallel systems for diverting consumer batteries from the waste stream, which would be highly inefficient and confusing to consumers and collection site operators.

Call2Recycle, Inc. participated in developing model legislation – working very closely with diverse stakeholders in the state including DEEP and municipal governments -- that would be the basis for an efficient, fair and effective program in the state. We strongly urge the Committee to consider that approach.

Sincerely,

Todd J. Ellis, Director
Stewardship Programs
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