



the plastics industry
trade association

Connecticut
Raised Bill No. 233 – Oppose
Environment Committee
Set for Hearing – March 4, 2016

Dear Chairman Kennedy, Chairman Albis and Members of the Environment Committee:

SPI: The Plastics Industry Trade Association appreciates the opportunity to provide testimony to Raised Bill No. 233, “An Act Concerning A Reduction of Consumer-Based Packaging Materials”. SPI is a diverse manufacturing trade association representing the entire plastics industry supply chain. In Connecticut, the plastics and dependent industries combined employ more than 400 thousand workers. Direct payroll is \$550 million with dependent industries adding another \$20.6 billion to the state payroll.

Legislation is Premature

This legislation is premature, given the ongoing work of the Department of Energy and Environment Protection (DEEP) and their revised Comprehensive Materials Management Strategy (CMMS). The draft CMMS is currently under public review and comment and addresses the subject of this bill among others. Further, the CMMS takes a holistic view of the state’s solid waste stream, whereas this bill takes a very narrow and potentially costly approach.

A Tax on Business

Establishing an industry-financed stewardship program for the collection, management and recycling of consumer packaging equates to another tax on business. It creates a new regulatory burden and unknown costs which will principally be borne by business. It ignores market-driven programs which are the most efficient means of collecting and reusing product materials. They further create inefficiencies and stifle innovation and competitiveness. Nor do they provide for any flexibility in terms of response to changing markets while siphoning resources that could be directed towards design innovation and research and development. There are a number of ongoing programs such as the Closed Loop Fund, the Recycling Partnership and others that we support and which drive recovery of recyclable commodities.

We thank you for the opportunity to offer our views on this legislation, but we cannot support the bill for the reasons listed above.

Respectfully,

Jane A. Adams
Senior Director, State Government Affairs