

**Testimony
for the
Environment Committee
of the
Connecticut Legislature
on
House Bill No. 05103**

**Submitted by
CT Chapter
National Waste and Recycling Association**

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INTRODUCTION

The CT Chapter of National Waste and Recycling Association (hereafter The Chapter) represents an industry that is dedicated to the environmentally protective, sustainable and economically efficient management of recoverable and recyclable materials, discards and wastes.

We have a vision of a society that reduces waste, recycles more and recovers value from discards to the maximum extent practicable and properly disposes the wastes that remain. We approach our job as reality-checkers who must negotiate, adapt to, and address the day-to-day and evolving conditions associated with collecting and handling recyclables, recoverable materials, discards and wastes. We are in a unique position to offer well informed perspectives on the realities of how these materials are managed today, and how they can be better managed tomorrow.

We are grateful for this opportunity to provide these comments to the CT Environment Committee on this legislation about new requirements for the siting, building and operation of the facilities our industry run to manage the recyclables and wastes generated by the citizens and businesses of CT.

House Bill No. 05103 – An Act Requiring Evaluation of the State’s Environmental Justice Law

The CT Chapter is greatly alarmed and concerned with the ill effects that will be created if this measure becomes law. Its passage will send chills throughout the state’s recycling and solid waste industry; and, will be a severe blow to the great progress the state has made to bring on-line the new and modern infrastructure to handle recyclables, organics and wastes to meet the state’s aggressive environmental goals.

What is terribly wrong with this measure is that it seeks to add-on several new rules for recycling and waste facility development -- all of which are unnecessary since the established process already provides ample opportunities for all interested parties to review new proposals and major modifications to existing facilities.

We urge the Legislature to strongly resist adding the new provisions contained in this bill to the process for developing recycling, organics and waste facilities. If they are adopted, they will send a terrible signal to project proponents who might be interested in bringing their investment capital and projects to Connecticut *since adding these new extra project review steps will make an already most difficult review and permitting process only that much more difficult.* Adding them will create more uncertainty and costs; and will prevent good, solid projects and facilities from even being put on the table for consideration.

The CT Chapter believes coordinating local government recycling and waste facility reviews with state reviews is a bedrock principle of the state's facility development system. It is our experience that the well thought out processes, already established, and thoughtfully developed in concert with a wide and inclusive array of stakeholders, creates workable procedures, that by their design, render the need for this legislation unnecessary. That said, this bill should not be reported out by the committee.

The last points we will make about House Bill 05103 involves our concerns about the unintended, unknown impacts its adoption may have on recycling and solid waste facilities in CT. Will adding these new provisions to the law grant new authority to other communities and permit any one of them to effectively shut down an existing permitted waste or recycling facility in its jurisdiction or an adjoining community, should such a community wish to pursue such an action? Will these change lead to a complete stop of all essential recycling and waste facility development and thwart their essential development to meet the state's recycling, organics and waste minimization goals; and to meet new goals as they emerge?

For these reasons we respectfully request that this measure not be advanced in the legislative process and that no further consideration for its passage be given at this time.

The CT Chapter represents the private taxpaying recycling and waste haulers and companies that work in CT every day to responsibly manage the after useful life discards, materials, recyclables and wastes generated by its citizens, communities and businesses. We believe in strong, sustainable environmentally responsible programs that are run with the efficiency and expertise that comes from a competitive and robust private marketplace that provides and innovates these services routinely.