



ESTABLISHED 1975

## Testimony for Committee on Environment February, 27, 2023

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As members of the Committee on Environment, you have a difficult charge. I understand the impetus behind Governor's Bill HB 6664, and while it has some components with merit, there are others that should be assessed very carefully. As a whole package HB 6664 should raise concerns for this Committee.

Firstly, I would like to comment on the draft EPR portion of HB 6664. The phrase "the recycling system is broken" is overused and patently false. When I visit one of Casella's seven material recovery facilities across the Northeast and watch items that are defined as "Packaging" and "Paper Materials" being delivered by haulers, getting sorted on the lines, and then processed for sale to end markets, I can assure you that the system is working just fine. Recycling haulers have no assurances with the EPR policy as proposed that they will continue to pick up these materials from consumers, and that reduction in volume and customers has the potential to crush their business model. Recycling processors have no assurances with the EPR policy as proposed that they will continue to receive these materials, and taking valuable commodities out of the recycling stream has an enormous impact at many levels. Less volume of recyclables means increased pricing for processing, and less ability to make investments in the recycling technology that is necessary to move recycling rates upward. You have heard that USA Waste has recently completed a major retrofit of their recycling facility, and Casella is scheduled to make enhancements at the Willimantic facility in 2024. If there is less material coming to our facilities these improvements become economically unfeasible to make. And technology is improving! Recycling facilities will be upgraded over time with robots and AI that enables more items to be processed at higher volumes over less time. It is an exciting time to be in our industry, and we want to be part of the solution, but implementing EPR that covers materials already being recycled through existing programs is not the answer.

The EPR proposal requires that stewardship organizations register in January 2025. As part of that registration, there must be a description of the scope of work for a needs assessment study. That study must include elements such as the current rates of recycling for each covered material; capacity, costs and needs associated with the collection, transportation and processing of the covered materials; the net cost of end life management of discarded covered materials; barriers affecting access to recycling, the list goes on. That study must be concluded, and the stewardship organization has to submit a plan, in one year. Does it not make sense to know all of the elements of the needs assessment before you implement a full blown, all encompassing EPR program? Would it not be important to understand where there could be redundancies in the system if EPR is implemented, and what products are already being readily recycled? One of the goals the stewardship organization must address is how it will minimize greenhouse gas emissions from the life cycles of the covered materials and from program operation. This EPR program as drafted is not going to minimize greenhouse gas emissions, it only stands to increase the carbon footprint in the State through redundant efforts to manage products already being collected and processed through existing infrastructure.

Connecticut has implemented some very successful select EPR programs for hard to manage materials. That continues to be the answer. Add to that list and refer to the definition of "Packaging-like products" in HB 6664 when you do so. These are materials that are not easily handled by existing recycling facilities, and they are



ESTABLISHED 1975

often contaminated with food waste rendering them non-recyclable. Please focus your work on decreasing these types of single and short-term use “Packaging-like products” for sale in the State, and if they are distributed, make sure that they have the highest level of post-consumer recycled content possible. To that end, implement stand-alone legislation that increases post-consumer recycled content as described in HB6664. Casella, and likely our peers as a whole, will back these two initiatives. But please do not try and solve for a problem that does not exist by removing “Packaging” and “Paper Materials” from today’s recycling system. And come visit one of the recycling facilities in the State for a demonstration of these materials being processed, and to see the good work that is being done by our industry.

Also of concern in HB6664 is the increase in fees for solid waste management. At a time when the public is contending with incredible inflation, increasing fees that will be pushed back to residents seems unfair and unwarranted. In addition, if the intent is to charge a different rate for waste being disposed of in state vs. transported out of state, I am unaware of any state in the Northeast that has a fee structure that distinguishes in this fashion, and would strongly encourage the Committee to understand all of the legalities of such a structure.

I urge you to vote against HB6664, and instead focus on select EPR initiatives for hard to manage materials, and legislation that would increase post-consumer recycled content in packaging. Thank you for the opportunity to speak before you today.