

# Task Force to Study Methods for Reducing Consumer Packaging that Generates Solid Waste

## Summary of information and suggested recommendations presented to the Task Force and submitted by Task Force members (Oct. 10, 2017)

The following is a consolidation of suggested recommendations that have been submitted by interested parties and by Task Force members. This list IS NOT the recommendations of Task Force. The suggestions that follow are simply a consolidation of the recommendations made before the Task Force and may not reflect the viewpoints or opinions of the Task Force or the Task force members.

### I. PURPOSE

To create a summary of the recommendations presented or submitted to the Task Force to Study Methods for Reducing Consumer Packaging that Generates Solid Waste (Task Force).

### II. SUGGESTED RECOMMENDATIONS FROM TASK FORCE MEETINGS

Below is a summary of the recommendations from presenters invited to speak before the Task Force taken from their oral presentations as well as their written comments, if received. Copies of presentations and written comments can be found at the Task Force [website](#). Recommendations from oral presentations were taken from meeting notes and audio recordings of each meeting.

#### A. **MAY 25, 2017 –MUNICIPALITIES AND MUNICIPAL ADVOCACY ORGANIZATIONS**

- Mayor Leclerc, Town of East Hartford  
Written Recommendations: None received  
Oral Presentation / Question & Answer Recommendations:
  - Municipalities sometimes receive negative impacts of state decisions. Stated Task Force must be thorough, open, transparency and honest.
  - Concern based on experience with mattress EPR (social, environmental and economic negative impact). With mattress EPR program, the vendor was selected for the Town (they did not choose) and was not able to engage and provide feedback.
  - Don't want to pay more money for less service.
  - A broad brushstroke of EPR is not the answer. EPR is just another tax passed on to the consumer.
  - What is needed is a strong educational push in the communities. EPR doesn't change behavior.
  
- Fred Hurley, Town of Newton, Public Works Director  
Written Recommendations: None received  
Oral Presentation / Question & Answer Recommendations:
  - Not asking for total relief but asking for partnership from the producers and all other stakeholders. Structural change is the only way to continue to sustain services, be environmentally responsible, and move forward to meet state mandates.
  - Industry knows its business. Industry will cover its costs and, because it knows its material, can set up a system. Towns are the last line of defense and the ability to pay has a breaking point. What will happen is the towns will stop doing it.

- Don't think there's one answer/solution. Packaging producers that reduce packaging helps. Towns structurally changing how garbage is collected helps. Instill accountability across the system. It won't just be EPR or the change in national packaging laws. It's a combination of all things.
- Dan McGowan, Town of Branford, Solid Waste Supervisor  
Written Recommendations: None received

Oral Presentation / Question & Answer Recommendations:

- Biggest concern for all municipalities is cost. Recycling isn't free. It's a cost borne on the tax payers and it should be on the consumers and the producers.
- Multi-stream recycling (source separation at curb of paper/fiber products versus all other recyclables) does help with increase in revenue.
- An important piece is to clean-up the curbside programs to incentivize producers to use recyclable materials and make cost known to residents.
- Whatever system is put forth (EPR or otherwise) to incentivize people to make products that are recyclable and easily returned back into raw materials and minimize the amount made.
- EPR would help raise awareness that there is value of the materials and keeping them out of the waste stream.
- Jenny Walton, Town of Mansfield, Recycling Coordinator  
Written Recommendations: None received  
Oral Presentation / Question & Answer Recommendations:
  - Improve and expand the bottle bill.
  - With changes in packaging materials, it's difficult for municipality and processor to keep up and communicate with residents.
  - Positive experience with the EPR programs (paint, electronics, and mattresses).
  - Concern with marine debris. Question posed if packaging EPR would help with packaging innovation. Interested in learning more about packaging EPR and how it works in other communities.
  - Ease of implementation with PAYT. Residents are more aware of costs of reducing waste generation. Encourages more recycling. Have not found that PAYT increased contamination.

- Cheryl Ready, Housatonic Resources Recovery Authority, Director  
Written Recommendations: None received

Oral Presentation / Question & Answer Recommendations:

- We need to be in there together (MRFs, haulers, constituents, etc.). All must be part of the system that works. If public education isn't done, the quality of recyclables goes down. That impacts the MRFs.
- EPR programs have had good results in community. Want to find ways to meet the needs of towns and transfer station operators.
- Municipalities don't have funding to keep providing these services. Unclear on how municipalities will meet 60% recycling mandate.
- Responsibility should be on producers and passed along to consumers that purchased the product and not to the consumer that happens to be a taxpayer.
- Important to see solid waste haulers and MRFs stay in business.

- Recommendation for municipalities to take responsibility. Participate in Solid Waste Advisory Committee within DEEP and Connecticut Product Stewardship Council.
  - Political costs of changing to PAYT. Also challenge of implementing a voluntary PAYT system (who goes first, avoiding collusion, etc.).
  - EPR fees are not a tax. EPR fees are part of the cost of doing business included in the cost of the product. The easiest way to educate consumers is through their pocketbook.
- Tim Bockus, Town of East Hartford, Director of Public Works  
Written Recommendations: None received  
Oral Presentation / Question & Answer Recommendations:
    - Don't want to see local haulers and service providers pushed out of the system.
    - Local control is important. Competitive bidding. Take advantage of EPR programs.
    - Public education is key and the better outcome that will be achieved.
    - Recommend to explore how material is packaged. Residents aren't proactive in separating out recyclable and non-recyclable within the same package.
    - PAYT did not go over well in the community when proposed. Concern was over disproportionate impact on certain communities (e.g., transient populations, rental communities, lower income families).
  - Public Comment  
Kim O'Rourke, City of Middletown, Recycling Coordinator
    - Education and enforcement is important. But it's not the solution. The resources and means have not improved and it's becoming harder to do. Responsibility on other stakeholders is needed.

**B. JUNE 21, 2017 – ORGANIZATIONS WHO ARE PRODUCERS OR PRODUCTS THAT USE PACKAGING AND/OR PRODUCE PACKAGING MATERIALS**

- American Institute for Packaging and the Environment, Jeff Wooster, President  
Written Recommendations:
  - Encouragement of the evaluation of trends and focus less on specific numbers as there are too many variables to drive meaningful comparisons.
  - By using data to explore trends, these studies suggest that effective means to reduce packaging waste require a toolbox of programs and policies that address the full lifecycle of the packaging and not just a focus on recovery of packaging at end of life.
- Oral Presentation / Question & Answer Recommendations:
  - Industry has taken significant voluntary actions to reduce packaging primarily driven for economic reasons. Includes decreases in tons of packaging per capita over the past 15 years and changes in the type of packaging material utilized.
  - Light-weighted material can be effective at reducing the amount of waste generated. Source reduction along with recycling can reduce the amount of material that ends up as waste.
  - Focus needs to be on environmental benefits of recycling on different material types. Must assess, on a normalized basis, the relative environmental impact for different material types to show GHG emissions saved by one ton recycled. Each material shouldn't be treated the same and should be prioritized especially with limited resources to increase recycling and reduce waste.

- Recommendation to look at Oregon Department of Environmental Quality (DEQ) SMM efforts.
- Studies show EPR has only a small impact on recycling rates. It's a financial mechanism. Need consumer behavior and infrastructure independent of where money comes from.
- Role of packaging is to protect the contents. No experience with designing packaging as a result of an EPR system.
- Prioritizing of goals is needed using best scientific information to make decisions.
- The policy options that drive higher recovery rates are:
  - Automatic recycling (large carts automatically provided);
  - Pay-as-you-throw; and
  - Disposal bans on recyclable materials.

When two or three options are present, then a locality tends to have higher recycling rates for products covered independent of whether the locality uses an EPR system or not. If the financial mechanism is changed in the U.S., it doesn't mean recycling will increase at all because other policy levers aren't in place to ensure consumers are putting recyclables into the system. It's not that EPR is good or bad; it's that consumer participation and infrastructure drive increased rates.

- Understanding the need to keep the recycling system effective but must avoid making the system so punitive that it inhibits innovation.
- Industry is working through the Sustainable Packaging Coalition's How2Recycle label to increase public education. Adding additional information to packaging is an example of a way to communicate with people that they should recycle the item and has helped increase recycling of those items.

- American Chemistry Council, Craig Cookson, Director of Sustainability & Recycling, Plastics Division

Written Recommendations:

- Do not believe that mandatory EPR is the best way to achieve shared goals of improving performance of packaging recycling and fully utilize the value of materials currently being wasted in landfills.
- Consider adopting a holistic sustainable materials management approach that incorporates life cycle analysis and accounts for source reduction and energy recovery along with recycling. EPR policies ignore other sustainability considerations including greenhouse gas emissions and incentivize recycling at the expense of other environmental considerations.
- Fully enforce Connecticut's existing mandatory recycling provisions and pursue collaborative policy approaches.
- Earmark unclaimed bottle deposits ("escheats") to recycling activities before seeking out new sources of funding.
- Embrace voluntary plastics recycling programs and tools. Examples include WRAP and the Sustainable Packaging Coalition's "How2Recycle" label.
- Leverage national partnerships for grants, loans and assistance. Examples include The Recycling Partnership, the Closed Loop Fund, and the Grocery Rigid Plastics Recycling Program.
- Treat non-recycled plastics as valuable materials for conversion to fuels and chemicals.

Oral Presentation / Question & Answer Recommendations:

- Adopt a Sustainable Materials Management approach.

- Encourage sensible, broadly supported recycling policies (e.g., mandatory recycling, commercial generator, and multi-unit residential dwellings). DEEP has stated laws are not enforced. Before existing system is thrown out, focus should be on enforcement.
  - Relaxing regulations to encourage economic development. Includes mixed waste processing.
  - Earmark the bottle deposit escheats directly to recycling programs and protect from the General Fund as a policy option.
  - Explore policies such as pay-as-you-throw; providing technical assistance and best management practices; and focus on food waste prevention.
  - Standardizing plastics terms to help increase recycling and reduce confusion.
  - Concern over a state sanctioned monopoly (e.g., British Columbia) or vertically integrated markets. Don't want to lose competitive aspect of the U.S. recycling market.
- American Chemistry Council, Keith Christman, Managing Director for Plastics Markets  
Written Recommendations: None provided  
Oral Presentation / Question & Answer Recommendations:
    - EPR does not play a role in reducing marine litter; rather, it's an issue of how you manage waste and the systems in place. (UK, with EPR, is 18<sup>th</sup> on the list of leakers of material into oceans. The U.S. is 20<sup>th</sup>.)
    - Voluntary programs to support marine debris solutions including coordination with the Ocean Conservancy, EPA's Trash Free Waters, etc.
- Nestle Waters, Pete DePasquale, Director of Government Affairs  
Written Recommendations:
    - Private Partnerships that leverage the expertise of government, academia, industry, and other non-governmental organizations, are critical to driving innovation and the development of next-generation packaging. We encourage this Task Force to explore potential investments to foster new Public-Private Partnerships that leverage in-state expertise to achieve further source reductions across industries.
    - Since about half of all PET bottles are consumed away from home, investments are needed to collect material in public spaces and workplaces as well as in multi-family dwellings. Will help overcome challenges to develop a robust market for recycled PET (rPET).
    - Maintaining 2D / 3D separation screens, using properly programmed optical sorters, and implementing quality control procedures can all reduce contamination at MRFs.
    - Support for Closed Loop Fund.
    - Improve the existing bottle redemption program to make more efficient, less costly, and less susceptible to abuse. Simplify the process through voluntary universal redemption.
    - A funding resource to fully implement expansive policies (e.g., universal recycling, disposal bans, etc.) is the unclaimed deposits not directed to the general fund. The unclaimed deposits could be used to improve targeted MRF infrastructure and broadly implement best practices to improve the quality of the materials generated, and to ensure they make it to the correct bale. Also utilized to expand collection in some of the more difficult environments (e.g., away-from-home and multi-family dwellings).
    - Additional mechanisms such as sales tax exemptions and accelerated depreciation on specified recycling machinery and equipment should also be explored.
    - The current redemption system needs to be re-imagined with the twin goals of increasing recycling rates and enhancing the market for recycled materials as the driving

public policy rationales. The costs associated with the administration of the program need to be reduced and more equitably shared. If a material is more expensive to handle, the handling fee schedule should reflect that.

- Allow for the comingling of distributor products at redemption center locations and create centralized administration to reduce handling costs for redemption centers.

Oral Presentation / Question & Answer Recommendations:

- Invest in MRF infrastructure. Example of Closed Loop Fund for loans for municipalities and private enterprises.
- Investment in recycling machinery and equipment more attractive at the MRF level.
- Education initiatives need to be maintained including educating the public on what materials should and shouldn't be discarded in their curbside recycling bins.
- Nestle Waters wants to increase the recycled content of bottles. We don't need a stick to be induced to do it. We need a market so we can procure this raw material. We believe that, in the short term, the best way of doing that is strengthening our strong links which is the MRF infrastructure and making sure the product coming out of our MRFs is not contaminated.

- American Forest & Paper Association, Gretchen Spear, Director of Packaging & Government Affairs

Written Recommendations:

- Requiring the lightweighting of packaging in order to comply with a government mandate or anything other than to meet customer specifications could lead to increased product spoilage or damage and increase the overall environmental impact of packaging. It might also lead to a customer seeking an alternative producer or supplier that is not limited by the same mandates.
- AF&PA supports promoting increased paper recovery for recycling by raising awareness about the importance of recycling, creating public/private partnerships, educating key stakeholders about the success of the voluntary paper recovery system and providing tools and resources to help communities, businesses and schools start or improve paper recycling programs.
- Widespread adoption of these best practices for recovery (including efficient collection systems, an optimized processing infrastructure, effective education and communications, and appropriate support mechanisms) will contribute to increased recovery. At a minimum these best practices should be implemented before any consideration is given to external measures that will disrupt the solid recovery foundation Connecticut communities and their private sector partners already have built.
- AF&PA supports the separation of dry recyclable material from wet or organic solid waste community recycling systems to facilitate the processing and utilization of recovered fiber in a way that enables it to go to its highest value end use.
- AF&PA opposes policies governing collection and processing of recovered fiber that could increase fiber contamination.
- The State can support paper-based packaging recycling's success by avoiding mandates and potential arbitrary rules that dictate product contents or disrupt the current market-based recovery system.

- Support voluntary organizations such as The Recycling Partnership, the Carton Council, the Foodservice Packaging Institute (FPI) and the Paper Shipping Sack Manufacturers Association (PSSMA) to promote recycling.
- AF&PA believes responsibility for materials recovery and diversion must be shared across the entire supply chain and include consumers. The paper industry is doing its part by meeting or exceeding voluntary recovery goals for our products. We urge you to consider promoting increased participation in community recycling programs.

Oral Presentation \ Question & Answer Recommendations:

- Avoid mandates and arbitrary rules that could harm the increase of paper recovery.
- Allow industry to continually and successfully implement voluntary recycling programs.
- Support public-private partnership (e.g., The Recycling Partnership, Closed Loop Fund) that can provide additional funding to communities to increase recycling.

- American Beverage Association, Kevin Dietly, Partner, Northbridge Environmental Management Consultants

Written Recommendations: None submitted

Oral Presentation \ Question & Answer Recommendations:

- The escheats are actually consumers' money. Consumers are spending \$70M to have a system that recycles barely 2% of the waste stream. That's a policy choice. The Connecticut legislature is looking at expanding the bottle bill which would be another \$27M to recycle barely 0.1% of the waste stream. That's a really bad idea. The deposit system is keeping between \$8-10M of commodity value out of the comprehensive system.
- Source reduction in and of itself isn't a goal. The packaging must fulfill its function along with the value of the material downstream.
- ABA does not support individual state mandates on source reduction (early adopters left behind or disadvantages) or minimum content standards (market disruptor).
- ABA supports robust infrastructure for multi-material recovery. Including:
  - Access in terms of mandatory recycling (80-90% participation rates versus 15% with subscription services like what is seen in Connecticut);
  - Large covered volume carts;
  - Same day collection (can move from 30% to 60% recovery rates);
  - Multi-unit dwellings;
  - Use of high value materials.
  - Embedded rates (trash and recycling combined); and
  - Pay as you throw (regardless of political infeasibility).
- EPR is all about the guardrails. EPR is a financing mechanism and what we need to finance is the right infrastructure. If we need EPR to get the right infrastructure then it can be explored. Other options in Connecticut of generating revenue (e.g., potential income from deposit system).
  - Guardrails for EPR include best practices, shared responsibility, transparency, and organization. As industry, ABA doesn't have unconditional support for EPR without context.

- Grocery Manufacturers Association, Meghan Stasz, Director for the Sustainability Program

Written Recommendations: None submitted

Oral Presentation \ Question & Answer Recommendations:

- When packaging engineers at major CPG companies think about what packaging choices to make, there are a huge array of factors. Recyclability is certainly a factor but the overall objective is to reduce environmental impact (lowering GHG emissions, less material, etc.). In addition, packaging still has to perform.
  - Voluntary efforts with AMERIPEN, The Recycling Partnership, Closed Loop Fund, and Sustainable Packaging Coalition.
  - One of the reasons EPR does not cause changes in packaging design is because the way that EPR is set-up is that there are fees levied on different types of materials to either encourage or discourage those products in the system. It's market distortion and sends a mixed signal to packaging designers and companies.
  - If the focus is on how to incentivize the best environmental outcome, levying fees on different kinds of materials doesn't generate that outcome.
  - Promoting Best Design Practices: Don't stifle packaging material innovation because those new materials are what is driving down overall environmental impact, protecting product, and improving food safety. Want to avoid overly narrow thinking about older materials that are more commonly recycled. But from a GHG perspective, we want to promote innovation.
  - Food Waste: It's critical.
  - Cost and Efficiency: What's working in Connecticut? There are 5 MRFs (private businesses) so identify which ones performing the best and why. What are they doing in different parts of the state that might have higher recycling/recovery rates in order to replicate those results in other parts of the state?
  - Streamlined Messaging to Consumers: Helping consumers understand what can be put in the bin is critical. If that last link in the chain, even for products commonly recyclable, causes a disconnect then everything breaks down. Need to send consumers clear and consistent messaging on what can be recycled in order to get high quality materials into the system to help fund the MRFs.
- Dell – Stephen Greene, North America Restricted Materials and Global Restricted Materials Policy Leader
    - Written Recommendations:
      - Does not wish to see a patchwork of packaging take-back legislation imposed at the state level the way it's been done with electronics.
      - Legislation imposing EPR packaging take back in Connecticut would add unnecessary cost and complexity while limiting innovative packaging solutions.
      - Voluntary programs offer flexibility to be more efficient and more cost effective.
      - State government should incentivize the electronic industry in their procurement process by incorporating sustainable packaging criteria in state government bids.
      - Consumers have a responsibility to utilize existing resources that provide info on how/where to recycle packaging. Consumer should check DEEP's website and the manufacturer's website.
      - Align policies with a holistic approach to the circular economy.
      - Anticipate that laws and regulations are usually 5 to 10 years behind the technology.
      - With tradeoffs, additional costs come back to the consumer.

Oral Presentation \ Question & Answer Recommendations:



- Dell is concerned with a patchwork of EPR programs around the U.S. Dell has significant costs associated with EPR programs for electronics takeback. Those end up becoming fixed costs and distract from doing anything new or innovative.
  - Dell feels there is flexibility that, if we don't have a forced EPR program, but rather a cooperative relationship with trade associations that we can work together on and come up with common solutions. There are areas as an industry we can take advantage of such as adhesives on labels. Industry can work together to ensure it's less of a problem for recycling and long-term impact to the environment.
  - Expressed there is a concern with having recycled-content requirements in packaging materials. Dell can do it and would be fine with it. But Dell understands that not all packaging and businesses would find it to be workable.
  - There are a lot of trade-offs. There's not a single silver bullet. In reality, when companies have to spend more money to do something, it does go back to the consumer.
  - To run a program that is state specific takes additional resources to make sure you have accurate information, reporting structures, and the like.
- Additional Written Recommendations
    - Amazon:
      - Recommend that the Task Force consider packaging designed for online fulfillment as a best practice approach to sustainable packaging. Amazon's certified packaging standards drive rightsized packages that provide a better customer experience through easy access to the product, reduced damage (and the associated elimination of wasted packaging), and less material volume and packaging. Examples include Frustration-Free Packaging, Ships In Own Container (SIOC) and Prep-Free Packaging (PFP).
    - Plastics Industry Association:
      - Support for voluntary programs such as "Zero Net Waste", The Recycling Partnership, Closed Loop Partners, the Material Recovery For the Future (MRFF) program, and the work of the Sustainable Packaging Coalition.
      - Pursue "Pay As You Throw" as an option to help consumers be conscious about their disposal habits and assist in material diversion. This market-based approach between the haulers and consumers establishes a fair price for the disposal of waste while reducing the amount of recyclables and contamination in the waste stream.
      - Pursuit of activities and objectives of EPA's Sustainable Materials Management Program.
  - Public Comment:
    - Lawrence Truman, Citizen
      - Recommended fruit and vegetables remain in packaging (specifically Ziploc bags) to avoid outbreaks of disease.
      - Recommended planting of Venus fly traps or use of solar bug zappers around garbage bins to stop the spread of disease through flies.
      - Recommended getting trash picked up twice/week especially with leaching concerns of trash bins.

**C. JULY 19, 2017 – ORGANIZATIONS WHO ARE PRODUCERS OF PRODUCTS THAT USE PACKAGING AND/OR PRODUCE PACKAGING MATERIALS**

- Flexible Packaging Institute, Alison Keane, President and Chief Executive Officer
  - Written Recommendations:

- Consumer engagement through programs like Sustainable Packaging Coalition's "How2Recycle" label to inform residents of the opportunities to recycle.
- Promote policies and programs that look at the entire life-cycle of packaging and that give credit to packaging with a lower environmental footprint (regardless of end of life management options).
- Recognize energy recovery as a recycling option.
- Promote "alternative infrastructures" (i.e. store drop-off programs and consumer labeling programs).
- A robust consumer education and outreaching component should be combined with any end-of-life management.
- Educating and encouraging consumers to make environmentally-conscious decisions about single material flexible packaging is a practical solution and one that could make a big dent in reducing the amount of solid waste going to landfill and increasing the amount going for recycling.
- Reserve flexible packaging materials from any recommendation unless and until collection, recycling and end-use markets for these materials are commercially viable.
- There is no single solution that can be applied to all communities when it comes to the best way to collect, sort and process flexible packaging waste. Viability is influenced by existing equipment and infrastructure, material collection methods and rates, volume and mix, and demand for the recovered material.

Oral Presentation \ Question & Answer Recommendations:

- Energy recovery needs to be elevated as a viable solution and not downgraded as down-cycling or not part of the recycling system.
  - No recommendation for this part on EPR as a policy. EPR for financing is premature because, for flexible packaging, the industry doesn't know what it's financing yet. Once solutions are found, a financing mechanism will need to be put in place to either create new infrastructure, tweak the current infrastructure, or whatever other solution comes down the pipeline.
  - Before bans or restrictions or high financing of non-recyclables, a system needs to be in place for credit of upstream environmental benefits.
  - Avoid anything that limits opportunity. There are unintended consequences when you ban something.
  - Manufacturers don't manufacture for specific states. To interrupt the supply chain is expensive and disruptive.
  - Based on experience with paint industry and EPR, it was an easy decision because relatively small industry that could "own it" versus writing a blank check to local governments or a general fund. It was very difficult to do a state-by-state approach and one national program would have been preferred. Flexible packaging and packaging in general is much more complicated for EPR. Industry is so large and packaging types are so different. There is a disconnect on a viable solution that's cost-effective.
  - Don't want flexibles to pay to support EPR or a deposit if there isn't an infrastructure yet.
- The Recycling Partnership, Keefe Harrison, Chief Executive Officer  
Written Recommendations:
    - Contamination is not solvable by public education alone. Effective contamination reduction protocols involve stronger communication between the community and the

MRF along with operational components that engage the driver, route walker, and inspection officer.

- Utilization of capture rate studies to evaluate and understand how much and what sorts of trash are in the recycling and how much recycling is in the trash.
- Address current access across the entire state. Ensure that recycling opportunities are established completely on par with disposal. Identify service gaps at household, work and play levels.
- Address optimization of the existing programs. Increasing participation and reducing contamination requires evaluations of community-hauler-MRF contracts, local collection operations, consumer outreach, MRF processing protocols and more.
- True recycling success relies on the five integrated areas: end markets; reprocessing/mill production; MRF acceptability and sort-ability; collection and community engagement; and product design and production.
- Local governments must have "skin in the game" to take recycling programs to the next level.

Oral Presentation \ Question & Answer Recommendations:

- Clarification that The Recycling Partnership is not a financing model. But rather it leverages corporate dollars to make change in communities.
- Consumer confidence in a recycling program is one of the key drivers of participation and good participation to keep contamination out. Consumer interface and trust in system as a whole is key.
- Understanding the market drivers and what we can do to balance the playing field between virgin and recovered to get those environmental gains is important.
- Tools such as ASTRX collaboration with Sustainable Packaging Coalition help by identifying what criteria in a material needs to be met to employ end market receptibility.
- Consumers only hear from public education that they're great recyclers or it's too complicated. Must fight contamination with operational changes and public outreach.
- Policy alone doesn't build a healthy system. Where we see effective policy, must have operational aspect and community involvement.

- Citizens Campaign for the Environment, Lou Burch, Connecticut Program Director

Written Recommendations:

- Extended Producer Responsibility (EPR) as a way for manufacturers to internalize the costs of pollution they produce and incentivize them to use less excess packaging in order to keep operations as cost-effective as possible.
- Work with state and local governments to expand convenient access to recycling and composting programs for a variety of material types.
- Modernize the Container Deposit Model by increasing the container deposit from 5-10 cents on each covered container, and by expanding the program to include juices, teas, wines and liquor bottles and other non-carbonated beverage containers along with other types of product packaging (e.g., glass jars, plastic bins, etc.).
- Shift retail sales of food commodities toward self-serve packaging.
- Place fee on single-use paper and plastic bags or eliminate them altogether.
- Shift toward using packaging that is completely recyclable, compostable or reusable.
- Reusable plates and silverware.

- Offer composting services at major grocery stores, restaurant dining rooms, cafeterias and public spaces to dramatically reduce food waste.
- Establishments should purchase food items in bulk.
- A robust public education campaign including billboard, social media, and other kinds of advertising.
- Public education alone cannot achieve the Task Force objectives. Strong policy solutions are needed to ensure business and industry make the transition toward using less packaging.

Oral Presentation \ Question & Answer Recommendations: Presentation aligned with written comments. No additional recommendations provided in the question and answer portion.

- Yale University – Center for Ecology, Reid Lifset, Resident Fellow of Industrial Ecology

Written Recommendations: None received

Oral Presentation \ Question & Answer Recommendations:

- Cautioned that voluntary programs rarely amount to anything due to lack of data or lack of comprehensive and transparent data and lack of strong results relative to other policy approaches. Voluntary programs are not a substitute for public policy.
- EPR will address some issues and infuse more funding into the system. It will largely depend on the type of EPR system set-up and how it's structured.
- Bottle bill expansion is important especially to get glass out of the single-stream waste stream (e.g., lower contamination, higher value of glass). Expansion of container types covered would be beneficial.
- It would be difficult to use the existing system to increase packaging recycling by 25%.
- The most feasible solution in political terms for funding is EPR. The question is whether you want to spend the money on EPR, not whether EPR is an effective funding source.
- Not all recyclables are valuable. However, there are carbon benefits to recycling (but not every material).
- Preference would be to avoid complicated EPR systems but rather have a tax on carbon. Given political climate, EPR is the next best thing.
- Must ensure recycled materials are substituting for virgin material because that's where the environmental "bang for the buck" is. Markets are needed to make programs viable.
- No good study on if EPR generates a reduction in packaging. EPR definitely steers a reduction in it and, depending on fee structures, goods producers will change packages if the costs are high enough.
- Glass is a problem.
- Regarding the 60% goal, it's unclear if it's appropriate. Analysis like what is being done in Oregon looking at recycling in terms of greenhouse gas reduction benefits by waste stream is one way to analyze but difficult as funding for the EPA's analytical tools diminishes.
- Politicians will have to answer the questions about the moving money from one priority to another and the law of diminishing returns.

- Public Comment:

Eric Brown, Connecticut Business and Industry Association

- Noted that the goal is to reduce the amount of consumer packaging going to the trash, not reduce the overall amount of consumer packaging. This opens up the importance of public education versus creating a complex system for industry.

- Wanted to focus on how much is recyclable and how much is going into the recycling system. There might be simple recommendations for making big improvements.

#### **D. AUGUST 30, 2017 – INTERNATIONAL ORGANIZATIONS, GOVERNMENT ENTITIES AND GROUPS**

- Canadian Stewardship Services Alliance, John Coyne, Chair (Unilever Canada Inc.)

Written Recommendations: None received

Oral Presentation \ Question & Answer Recommendations:

- Support EPR as part of the circular economy and a way to combat climate change.
  - Encourage companies to be leaders, rather than be led in the area of EPR. Industry should work with government to develop systems that embrace free market thinking and avoid patchwork approaches (e.g., systems designed by business in conjunction with government).
  - Voluntary efforts don't work and result in fragmented systems with no scale, synergies or accountability.
  - Stressed a regional approach beyond a state or municipal approach is in the best interest of business along with consumers.
  - Benefits of a North American supply chain for scale and resulting synergies.
  - Outlined a regulatory framework based on the following:
    - Provides producers with operational and financial accountability of the recycling system in order to manage costs. EPR is not about writing blank checks.
    - Parties must agree on a set of performance standards that are reasonable and progressive while allowing producers autonomy to design programs in the way they see fit.
    - The system must ensure regulators are committed to taking compliance actions to ensure a level playing field.
    - Programs must be structured so compliant companies are not burdened by free riders.
    - Residents should have one set of recycling guidelines within a regional catchment area (i.e., waste-shed). A patchwork approach to accepted material is confusing and increases contamination. A consistent material list leads to more investment, efficiency, and recovery while also leading to cleaner, higher quality end product.
- Extended Producer Responsibility Alliance (EXPRA), Joachim Quoden, Managing Director
- Written Recommendations: None received
- Oral Presentation \ Question & Answer Recommendations:
- EPR as a key pillar in achieving a circular economy.
  - All "front runners" of EPR have the following in common:
    - Investment in separate collection of household packaging (i.e., convenient – door to door, container, etc.);
    - EPR alone will not solve problems and need additional economic instruments like landfill bans, landfill taxes and pay as you throw (PAYT) – must be combination;
    - Quality is key and the system must work with collectors, sorters and recyclers; and
    - Clear roles for responsibility with strong enforcement by authorities. Successful systems have a free rider rate under five percent (5%).

- All stakeholders in the value chain must be in agreement on the program to avoid boycotting of the system.
  - The responsibility of the government under EPR is to clearly fix the rules and enforce the program.
  - Ensure that the packaging put into the market can be collected and recycled.
- RecycleBC, Allen Langdon, Managing Director  
Written Recommendations: None received  
Oral Presentation \ Question & Answer Recommendations:
    - Feel they've created a program for the future.
    - The benefits of the RecycleBC program were highlighted as:
      - Established standardized material list for all curbside and multi-family collection across the province. Assists with consumer education and economies of scale.
      - Material list includes many items not included in traditional recycling programs (e.g., coffee cups, aerosol containers, plant pots, single-use coffee pods).
      - Glass is separated because of the impacts on the quality of fibers and plastics. Glass can be collected at curbside, from multi-family and at depots if separated from other PPP.
      - Plastic film and expanded polystyrene (Styrofoam) is also collected at depots (over 220 drop-off locations).
    - Transparency to recycling end markets and established standards for end markets.
    - Recycling rate increase from 55% to 78% was the result of expanding the list of mandated recyclables and expansion of curbside recycling programs. In addition, the wealth of data available is beneficial to track progress of program along with the structure of the MRF-equivalent facility (e.g., container recycling facility).
    - RecycleBC system represents a model of the circular economy in action where producers have influence both on the creation of the package and end of life management of the material. It provides the basis for more holistic decisions as new innovations in packaging are developed.
    - Having a system where each municipality determines its own material list prevents any sort of large scale innovation and hinders any significant changes in packaging design.
    - Regarding a bottle bill: I think what's going to drive that is environmental considerations. I think what most governments have to grapple with is if you have two producer funded systems with one relying heavily on trucks driving around to curbside to achieve recovery rates in excess of 75 percent, does it make sense to have a separate system that collects much of the same material that requires consumers to get in their cars and drive to a drop-off depot.
    - We strongly encourage our collectors to use "Oops" stickers and make it known that residents have to do the right thing.
    - Part of our activity in driving our contamination rate to the lowest in North America is by working with our collectors to give them the flexibility and mandate to work with their residents and get the recycling as clean as possible.
- Cariboo Regional District, Tera D. Grady, Supervisor of Solid Waste Management  
Written Recommendations: None received  
Oral Presentation \ Question & Answer Recommendations:

- Noted EPR doesn't cover all the government costs but could possibly if contamination was lowered and consumer incentivized to recycle (e.g., challenge with uncontrolled sites; no pay as you throw system).
  - Utilization of "Oops" stickers to avoid contamination at curbside.
  - Consistent messaging helps residents adapt. Also helpful to not have an established system when transitioning to EPR.
  - Consumers thankful to have access but don't fully comprehend who is paying for the program (i.e., consumer funded; not taxpayer funded).
  - Pay as you throw would be a motivator for consumer participation. User pay drives home that you are paying for what you're creating as far as waste and there is a cost associated with the waste you produce.
  - Without EPR, wouldn't be able to have the program due to remoteness and low number of tonnes produced.
  - Must have oversight to maintain quality and keep contamination out.
- City of Vancouver, Albert Shames, Director of Waste Management and Resource Recovery  
Written Recommendations: None received  
Oral Presentation \ Question & Answer Recommendations:
    - Net costs went down when participation started in RecycleBC although overall costs went up due to new material in system, volume restrictions on trucks, separation of glass, etc. When RecycleBC took over completed, costs went down to zero.
    - Turnover of system was successful due to close partnership (i.e., joint steering committee, joint staff working group). Joint efforts around communication; cooperation to minimize barriers; and interactions with City employees that had formerly operated program.
    - Funding after changeover to RecycleBC managing program was directed toward street cleaning programs (not given back to residents through reduction in taxes).

#### **E. SEPTEMBER 13, 2017 – COLLECTORS AND PROCESSOR OF RECYCLABLES**

- National Waste and Recycling Association, Steve Changaris, Connecticut Chapter Manager  
Written Recommendations:
  - Set realistic goals. The State should revisit the 60 percent diversion rate. In doing so, the State should choose a diversion goal that is realistic, practical, and economical. The State should evaluate the impact of advancements in light-weighting and the significant impacts that design innovations have had on the generation of packaging materials.
  - Enforce existing laws, rules and regulations. The recycling rate will increase if the State and underperforming towns and cities focus on enforcement of existing laws and the diversion of mandated recyclables.
  - Enforce existing laws, rules and regulations. Local authorities that are poor recycling performers must effectively, uniformly and aggressively enforce the relevant statutes and ordinances, specifically existing recycling mandates and disposal bans. Large municipalities must do more to enforce the applicable statutes and ordinances against owners of multifamily homes and apartment buildings.
  - Enforce existing laws, rules and regulations. Local authorities that are poor recycling performers must effectively enforce the relevant statutes and ordinances against commercial and institutional generators of MSW.
  - Educate. Local authorities must designate recycling coordinators to aid in educational efforts and tracking of recycling.

- Educate. To ensure uniformity across the State, the State should continue with the “What’s In, What’s Out” program.
- Understand the solid waste management infrastructure. The State should determine what gaps, if any, exist in Connecticut’s waste management statutes, collection infrastructure, and processing infrastructure that focus on the management of mandated recyclables.
- Require proper planning. Commercial and institutional generators of MSW must provide to local authorities recycling management plans showing that they have in place appropriate collection for MSW and mandated recyclables.
- Provide an incentive. Local and state authorities should provide tax incentives and tax exemptions for recycling equipment to encourage private investment. This will assist operators to upgrade equipment and systems, as necessary to meet market demands.
- Help municipalities. Local authorities should increase registration/permit fees to support recycling efforts. Local authorities should use the registration fees solely to support their recycling efforts and programs.
- Fix recycling. Glass cannot be processed by Connecticut’s existing MRF infrastructure. The bottle bill should be amended to include wine and liquor bottles and to no longer include plastic and metal containers.
- Fix recycling. The escheats from the “bottle bill” should be used solely to further recycling enforcement and education efforts.

Oral Presentation \ Question & Answer Recommendations:

- The State should support and incentivize its robust recycling infrastructure to meet its needs.
  - Connecticut should focus on the recycling behavior of all generators and improve education and enforcement to get material to the end markets.
  - Businesses should develop a business plan related to their waste and recyclables.
  - Cities and urban areas have a slew of problems but within the current resources and right leadership the needle can be moved forward. This could also help Connecticut get additional diversion points due to size of volume generated.
  - Focus on the 17 percent of the designated recyclables disposed. Look at the waste stream (through ongoing waste characterizations) and create targeted programs.
  - Encourage periodic waste characterizations of the other streams to identify new materials that can be diverted into the recycling system or create new recycling programs.
  - The current diversion rate goal should be revisited and modified using new data sets.
  - Bigger, more attainable diversion from disposal gains are likely to come from organics and construction and demolition.
  - Endorsement of bottle bill reform including a higher deposit on glass. Let aluminum and plastic flow into the single stream system but keep a deposit on glass bottles and expand to wine and liquor bottles.
- National Waste and Recycling Association, Chaz Miller, Director of Policy/Advocacy  
Written Recommendations:
    - A one size fits all approach of EPR does not work for consumer packaging.
    - Behavior change is crucial to making recycling work.
    - The state would do well to concentrate its efforts in four of its largest cities.
    - The state would do well to concentrate its resources on multi-family housing.



- General non-support for EPR in Connecticut (see last paragraph of [written comments](#)).
- Avoidance of a monopoly-based system of EPR (a single buyer of recycling services and single supplier of processor services).

Oral Presentation \ Question & Answer Recommendations:

- Recommendations for EPR should be specific and include lifecycle assessments (LCAs), cost and effectiveness, and no producer organization exemption from anti-trust laws. Recommends EPR program for sharps that includes a transparent recycling fee upon purchase; a mandatory collection container and mailback packaging; extensive education; and set-up so that nobody involved in the chain gets harmed.
- NWRA thinks Connecticut's existing economical and effective collection and recycling infrastructure will be harmed by being forced to go through the eye of the needle of a monopoly through EPR. It's not an efficient way in a free market system.
- Low hanging fruit is the cities that have low recycling participation, low recycling rates and aren't enforcing laws. Cities need to enforce the laws.
- On education and enforcement, recommendations for the following:
  - "Oops" tags. Warnings to residents for incorrect recycling.
  - Regular reminders on what can go into recycling bin.
  - Website.
  - Early-on enforcement.

### III. **ADDITIONAL WRITTEN PUBLIC COMMENTS**

Below is a summary of the suggested recommendations that were submitted to the Task Force for consideration prior to close of the public comment period on Oct. 2, 2017. Copies of full written comments can be found at the Task Force [website](#).

#### **A. AMERICAN FOREST AND PAPER ASSOCIATION (AF&PA)**

- Promote existing community recycling programs and continue to engage manufacturers and industry experts in discussions on further increasing recovery.
- Widespread adoption of best practices for recovery (including efficient collection systems, an optimized processing infrastructure, effective education and communications, and appropriate support mechanisms) will contribute to increased recovery.
- At a minimum these best practices should be implemented before any consideration is given to external measures that will disrupt the solid recovery foundation Connecticut communities and their private sector partners already have built.
- AF&PA supports the separation of dry recyclable material from wet or organic solid waste community recycling systems to facilitate the processing and utilization of recovered fiber in a way that enables it to go to its highest value end use. Mixed-waste processing systems increase the contamination of the recyclable fiber, and thus, limits its availability and viability for reuse in the manufacturing process. Consequently, mixed-waste processing systems tend to recover a lower percentage of marketable fiber than single-stream materials recovery facilities.
- AF&PA opposes policies governing collection and processing of recovered fiber that could increase fiber contamination.
- Allow market forces to guide paper and paper-based packaging recycling and recovery systems in order to promote waste reduction and divert recyclables from landfills.
- Avoid EPR schemes. Consistently high recovery rates, a well-established infrastructure already in place to collect and process paper products, and the industry's ongoing efforts to increase voluntary recovery, make mandates like EPR on paper and paper-based packaging unnecessary. Creating a state-administered board to control the flow of materials subject to an EPR program will disrupt the complex and efficient markets for recovered fiber, likely resulting in less fiber recovered for recycling and substantial additional administrative cost that eventually will be paid by consumers or taxpayers.
- For paper and paper-based packaging, EPR could prove to be harmful or even counterproductive. The life path of paper-based packaging is not contained in one state.
- AF&PA supports the continued development and promotion of proven best practices that will leverage the existing investments in recovery. Widespread adoption of these best practices for recovery (including efficient collection systems, an optimized processing infrastructure, effective education and communications, and appropriate support mechanisms) will contribute to the recovery success sought. At a minimum these best practices should be implemented before any consideration is given to approaches such as EPR that, in fact, will disrupt the solid recovery foundation Connecticut communities and their private sector partners already have built.
- The State can support paper-based packaging recycling's success by avoiding mandates and potential arbitrary rules that dictate product contents or disrupt the current market based recovery system. As history has demonstrated, the market operates efficiently when it comes to paper recovery and recycling. The idea that arbitrary decisions from government will improve paper recovery and recycling goes against common sense and past experience.

- AF&PA partners with organizations such as the Recycling Partnership, the Carton Council, the Foodservice Packaging Institute (FPI) and the Paper Shipping Sack Manufacturers Association (PSSMA) to promote recycling nationally.
- Connecticut set a 60 percent diversion goal for 2024 and seeks ways to achieve this without necessarily increasing the available funding for existing environmental programs or increasing the staff and resources at the Department of Energy and Environmental Protection. Partnerships such as those already mentioned and pay-as-you-throw programs are optimal ways to make progress toward the diversion goal without redirecting essential packaging producer funding away from programs in paper-based packaging recovery already proven to be successful.

#### **B. AMERICAN INSTITUTE FOR PACKAGING AND THE ENVIRONMENT (AMERIPEN)**

- Strengthening efforts to encourage CT municipalities to increase access to and automate enrollment for curbside recovery services.
- Encourage the use of cart based residential recycling programs. Making recycling similar to trash pickup to enhance convenience and participation.
- Implementing Statewide Pay-As-You-Throw Based Pricing or “SMART”
- Be careful with EPR – While the concept of EPR requires producers to take financial and management responsibility for products at their end of life, there has been no study to date to prove the policy’s efficacy in driving efficiency through the system. Nor is there comprehensive data to assess the impact of EPR in reducing costs to the State. In fact, some reports suggest that EPR increases costs due to additional administrative duties.
- More information on EPR is needed – EPR systems are highly variable across the globe, and contractual obligations, in some cases, have made it difficult to provide full transparency into costs and revenue. As a result, despite a number of attempts to draw comparisons, there is significant agreement that there are simply too many variables across EPR systems to draw meaningful comparisons and insights into efficacy and cost. In some cases, EPR programs, like the electronics takeback programs, are witnessing an increase in fees and unanticipated costs, partly as a result of fluctuations in commodity pricing and global trade restrictions. Drawing conclusions based on EPR in other regions is further complicated by demographic and lifestyle nuances. Household size, geographic difference, population density and consumption patterns all impact how we buy, consume and dispose of materials.
- Create incentives - Incentives can be behavioral changes, such as increasing inconvenience, but also financial.
- Explore the role participation, consumer incentives, and access play in increasing recovery and reducing overall system costs. This can be achieved by applying strategies to promote:
  - Universal Access to Recycling
  - Use of Cart-Based Services
  - Application of Statewide PAYT requirements
- Consider a lifecycle approach (SMM) to managing wastes. This can be done by identifying high target materials per the State waste characterization studies, by identifying the inadvertent consequences that can occur by only looking at end-of-life and by realigning goals to consider impacts rather than outcomes.

#### **C. BRISTOL FACILITY POLICY BOARD**

- Avoid disruptive legislation - Now is not the time to consider aggressive new legislative efforts dealing with recycling markets, the State of Connecticut needs to focus attention on adopting a budget and establishing sound fiscal policy. We witnessed numerous attempts to reshape

beverage container legislation, with wide divergence of opinion among legislators and stakeholders leading to a stalemate.

- Get more information before you do anything with EPR - It is unclear how the claimed 78% recovery rate (Recycle BC) compares with Connecticut data, nor whether the Task Force will attempt to clarify how its analysis might enable a direct comparison. Investment in startup of a program such as Recycle BC is significant, and Connecticut is not well positioned to spend millions launching or managing this effort.
- We understand DEEP, the Product Stewardship Institute and some Connecticut municipal and regional representatives advocate for a model similar to the Province of British Columbia, known as Recycle BC (formerly MMBC). This agency reports \$83 million annual costs of which approximately \$63 million is applied towards collection and recovery of materials, \$9.1 million is administrative, \$1.5 million education and \$200,000 is applied towards R&D. Recycle BC reports a 78% recovery rate, an increase from 58% mainly due to the expansion of the mandated recyclables list and the development of curbside collection in multi-family units.

#### **D. FROM NATIONAL WASTE AND RECYCLING ASSOCIATION**

- The State should revisit the 60% diversion goal. In revisiting the goal, the State should consider what is realistic, practical, and economical; the impact of advancements in light-weighting; and the impact of design innovations.
  - The capacity of available Connecticut disposal facilities should not be considered when determining the diversion goal.
  - Diversion goal should be based on accurate data as to the amount of individual packaging and other recyclables generated in Connecticut.
  - The State should determine if there are markets for recyclable materials in this waste stream and how, if at all, those markets can be efficiently and economically supplied by Connecticut's waste and recycling industry. In the 2015 Waste Characterization Study, the State's consultants determined that approximately 40% of the disposed MSW consists of potentially recoverable materials.
  - Connecticut must continue to focus on the possible diversion of food waste because it is a substantial part of the disposed MSW.
  - Connecticut should account for the significant strides that the packaging industry has made to reduce packaging materials.
  - DEEP should determine the amount of waste avoided upstream and downstream, as a result of packaging source reduction efforts including light weighting and other techniques.
- The State should determine what gaps, if any, exist in Connecticut's waste management statutes, collection infrastructure, and processing infrastructure that relate to the management of mandated recyclables in order to find ways to recover more of those materials.
  - DEEP has insufficient data as to the amount of consumer packaging generated and recycled in Connecticut.
- Before setting any recycling or diversion goals, DEEP must present data establishing how much and what kind of consumer packaging is generated within the state, the current recycling levels for those packages and the primary sources of unrecycled packaging.
  - Every 3 years, DEEP should perform or have performed waste characterization studies to track progress, evaluate priorities, and create new priorities based on markets, technological innovations, and the evolution of the waste streams.
    - DEEP should track the disposal of residential MSW to assist towns and cities in evaluating their efforts to reduce, reuse and recycle.

- DEEP should track the disposal of commercial MSW to assist towns and cities in evaluating their efforts to reduce, reuse and recycle.
  - Local authorities that are poor recycling performers must effectively, uniformly and aggressively enforce the relevant statutes and ordinances, specifically existing recycling mandates and disposal bans. Large municipalities must do more to enforce the applicable statutes and ordinances against owners of multifamily homes and apartment buildings.
  - To ensure uniformity across the state, DEEP should continue with the "What's In, What's Out" program. The State should continue with its efforts to increase the availability of drop off sites for film/plastic bags.
  - Local authorities that are poor recycling performers must effectively enforce the relevant statutes and ordinances against commercial and institutional generators of MSW.
  - Commercial and institutional generators of MSW must provide to local authorities recycling management plans showing that they have in place appropriate collection for MSW and mandated recyclables.
  - When local authorities issue building permits, they should require the owner to make available a convenient recycling infrastructure that is equal to the infrastructure available for the management of MSW. If appropriate infrastructure is not available, the building permit should not be issued.
- The State must increase its recycling rate for C&D waste materials. The State should pass legislation similar to C.G.S. §22a-226e, a law that requires certain generators of food waste to recover food waste if an appropriate food waste recycling facility is located within 20 miles of the generator. The "new" law would require generators of C&D materials to deliver or have delivered the C&D materials to appropriate material recovery facilities if a recovery facility with sorting equipment is located within 20 miles of the generator.
- Local authorities should increase hauler registration/permit fees to support recycling efforts. Local authorities should use the registration fees solely to support their recycling efforts and programs.
- The escheats from the "bottle bill" should be used solely to further recycling enforcement and education efforts.
- The revenues created by the solid waste assessment (C.G.S. Sec. 22a-232) should be used solely to promote recycling education and programs in the under-performing cities.
- Local and state authorities should provide tax incentives and tax exemptions for recycling equipment to encourage private investment. This will assist operators to upgrade equipment and systems, as necessary, to meet market demands.
- Extended producer responsibility for consumer packaging is not recommended because:
  - Extended producer responsibility for consumer packaging will not significantly improve Connecticut's collection or processing.
  - Extended producer responsibility for consumer packaging will not significantly improve the quality of the materials processed by materials recovery facilities and sold to end markets.
  - Extended producer responsibility for consumer packaging will harm Connecticut's economy, Connecticut's waste collection and recycling businesses, and Connecticut's materials recovery processing facilities.

- Extended producer responsibility for consumer packaging will not improve the enforcement of the applicable recycling statutes and ordinances.
- Extended producer responsibility for consumer packaging will substantially increase the cost of the collection, processing, and marketing of mandated recyclables.
- Extended producer responsibility for consumer packaging does not incentivize recycling since producers pass costs on to consumers and often results in the consumer paying a higher cost to recycle due to the creation of additional program bureaucracy and added administrative expenses for producers that will be passed on to consumers.
- Extended producer responsibility for consumer packaging will make it more costly and burdensome for Connecticut packaging companies, brand owners and retailers to do business in the state of Connecticut.
- Extended producer responsibility for consumer packaging, will not cause design changes that improve the recyclability of a package in Connecticut or elsewhere.
- Fix the glass problem - Glass cannot be processed by Connecticut's existing MRF infrastructure. The bottle bill should be amended to include wine and liquor bottles and to no longer include plastic and metal containers. The State legislature should consider the use of tax incentives to help the establishment of a secondary glass processor to Connecticut

**E. FROM THE FLEXIBLE PACKAGING ASSOCIATION**

- When looking at specific policies and programs that will help consumers reduce the amount of packaging they create and for reducing consumer packaging that generates solid waste, the Task Force should take into consideration the entire life-cycle of the packaging and not just end-of-life management as well as energy recovery as a viable option.
- Recognize waste to energy as a pathway to continuing to achieve environmental progress.
- Consider sustainable landfill practices and other material storage options.
- Continue to reward recycling efforts and increase incentives for recycling.
- Consider upstream packaging improvements as part of solid waste planning.

#### **IV. THE FOLLOWING ARE RECOMMENDATIONS SUBMITTED BY TASK FORCE MEMBERS**

The members of the Connecticut Task Force to Study Methods for Reducing Consumer Packaging that Generates Solid Waste were asked to submit their recommendations for the Task Force to review and discuss. As Task Force members, the group had an opportunity to hear viewpoints and thoughtful debate about packaging over several months. The Task Force appreciates and values the time that presenters took to prepare for oral and written testimony.

The Task Force was always cognizant of its objective which is "...to study methods for reducing, through source reduction, reuse and recycling, consumer packaging that generates solid waste in the state."

As acknowledged throughout the Task Force meetings, this is a complex issue involving many independent stakeholders without a single, simple solution. As commerce moves online (eCommerce), consumers play an even more important role in managing packaging waste. The ever "evolving ton" impacted by reductions in paper, increases in cardboard at curbside, increases in plastics, the introduction of lightweighted packaging, and other initiatives will continue to impact how material is collected and recycled in Connecticut and across the U.S.

As a Task Force we must acknowledge the important role that packaging plays in delivering a product whether it is protecting a high value electronic device or it is designed to reduce food waste.

##### **A. FROM TASK FORCE MEMBER HAP PERKINS**

- The Task Force needs to be clear on the problem to solve and its costs and value. The problem we are presented with is diverting consumer packaging through source reduction, reuse, and recycling. Determining and measuring performance targets (weight). Increased recovery, recyclability, recycled content, and public/private partnerships to improve recycling diversion, and recovery - 25% reduction by 2027. Packaging includes shipping, covering, bundling and displaying.
- Do not put additional burdens on the citizens and businesses of Connecticut nor should we distract from issues more significant or that have greater value. Fees, administrative costs must be quantified and cannot be disguised.
- The State needs to reevaluate its diversion goals.
  - Is trend actually lowering by itself?
  - Connecticut not taking this into account?
  - What is the cost versus the value of getting to 60%? Make goals engineered and realistic.
  - Increased packaging can reduce food and product waste.
  - How will light weighting be accounted for?
  - There is enough motivation for cost, innovation, market acceptance, etc. for retailers, package producers and packaging users.
- Let the market be the impetus (design, material) for recycling and waste reduction.
- Avoid fees and hidden taxes - Fees will not create enough of an incentive and their fair determination and administrative costs will be a further burden. Marketing/labeling will add to consumer input into choices and acceptance. Thirty three % of consumers now decide on social and environmental impact.
- Avoid EPR –
  - Does not reduce the environmental benefit of not using virgin materials.
  - Difficult when different rules across regions.
  - Different consumer prices across different areas.

- Complex and costly administration.
- Needs to maintain competition.
- Fee determination difficult.
- No blank checks-must be control over program-revenues and costs.
- Transferring responsibility and funding does not solve the problem.

**B. FROM TASK FORCE MEMBER WAYNE PESCE**

- Utilize 10% of current bottle law escheats revenue (\$35MM) to build long term, sustainable ad campaign that educates CT consumers on recycling properly and includes robust litter component as well
- Create statewide recycling competition in all Connecticut grammar, middle & high schools
- CTs largest cities are underperforming with diversion and recycling programs – mandate that (4) of CT’s five largest cities improve diversion rates above 30% by 2020 (Stamford already at 37%)
- Adopt & enforce statewide multi - family recycling requirements
- Economic incentive for construction & demolition– fee required with permit, fee returned when recycling quota met
- Styrofoam ban for restaurants & outdoor event venues
- Establish working group to study longer term solution for glass –include manufacturers, haulers, recyclers & state entities

**C. FROM TASK FORCE MEMBER DAVID J. JORGENSEN**

- Strive for more effective recycling of packaging.
- Avoid EPR - an interesting idea but it is a monopoly on the recycling industry through taxing consumers indirectly by collecting fees from the producers to accommodate the monopoly.
  - These producers are going to pass these added expenses on to consumers, they have no choice.
  - EPR may be job killer in many industries - something we can absolutely not afford in this state. Monopolies do not innovate and are never good for business or jobs.
  - Further, the model in BC is still in its infancy and not relatable to our demographics in CT.
- Encourage the use of carts for recycling
  - A. Ensure residents have access to large carts to facilitate more recycling.

**D. FROM TASK FORCE MEMBER KATIE REILLY AND THE CONSUMER TECHNOLOGY ASSOCIATION**

- Earmark the unclaimed bottle deposit receipts (“escheats”) to support municipal and public space recycling programs including public education, enforcement activities, and public space collection programs. Per testimony, this funding amounts to over \$20 million (upwards of \$30 million) per year directed to the general fund. That is a significant source of funding already available in Connecticut that can be provided to local governments.
- Leverage the use of voluntary, industry-funded programs such as Wrap Recycling Action Program (WRAP, which is already under way in CT), The Recycling Partnership (to analyze the recycling stream, support local government implementation of best management practices, problem-solve), and The Closed Loop Fund (funding for investments in recycling infrastructure). Work with industry to increase public awareness of the need to recycle packaging through school curriculum programs like Young Minds Inspired (a current CTA partner). Allow these voluntary programs time to be implemented and achieve results.



- Implement a statewide Pay as You Throw (PAYT) system to ensure consumers understand the amount of waste they produce and the opportunity for recycling. This will help to create a recycling ethos among the residents of Connecticut and, by understanding their waste generation, may impact consumer purchasing and disposal behavior.
- Create a comprehensive list of statewide materials for recycling that must be collected from residents in each community to reduce consumer confusion and improve the quality of the recycling stream.
- Separate glass into its own collection stream to reduce contamination of other recyclables and respond to changes in recycling markets. This should include not just beverage glass covered under the current bottle bill but all glass containers.
- Partner with one or more organizations, such as CTA, on a recognition program to help drive market innovation in packaging design to reduce and minimize the amount, weight, and volume of consumer packaging as well as increase the proportion of biodegradable, postconsumer recycled and recyclable materials. Testimony presented before the Task Force made clear that packaging innovation is already happening without additional policy levers.
- Mandated approaches on a state-specific level are extremely burdensome to industry, heavy-handed in their approach and ineffective in terms of changing packaging design. Industry does not design products or packaging specific to an individual state.
- When issues related to packaging design or recyclability negatively impacting the Connecticut recycling system or collection infrastructure arise, the Connecticut DEEP or Connecticut's recycling industry representatives should engage with industry working groups such as the Sustainable Packaging Coalition which can address issues at a national or even global level across relevant product and material categories.
- EPR for packaging creates unnecessary bureaucracy and Connecticut lawmakers should instead move forward with the action items listed above. Beyond the identified problems with a mandatory EPR packaging system, it is unclear the potential economic impact and costs an EPR program would have to businesses operating in Connecticut.
  - No full analysis was provided on the costs associated with an EPR system for Connecticut nor is there an understanding of cost savings, if any, to municipalities.
  - The full cost of the current system is also unknown. This makes it difficult to understand if an EPR system would achieve increased efficiencies or create economies of scale.
  - Other industries currently complying with EPR laws (e.g., paint, mattresses, carpet) stress that showing costs to consumers sends the signal to the buyer that recycling is not free. By paying a visible fee, those consumers are now part of the recycling chain to build a recycling ethos versus the hidden fees captured under EPR. How a similar visible fee system for packaging would work is not clear.
  - PAYT is not implemented across Connecticut. During the August 30, 2017, presenter Joachim Quoden noted that PAYT is an economic incentive that must be in place in order for EPR to be successful.
- In conclusion, I want to highlight another comment from Mr. Quoden at the same meeting in which he stated that all stakeholders in the value chain must be in agreement on the program to avoid undermining of the EPR system. I caution that the necessary stakeholders have not yet reached such agreement. It would be premature to push forth with EPR legislation in Connecticut without the support of the product manufacturers; packaging producers; and the waste and recycling industries, all key stakeholders which each expressed their concerns with EPR to the Task Force.

## E. FROM TASK FORCE MEMBER TOM METZNER AND THE CONNECTICUT DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION

- Use EPR to Improve Recycling Outcomes
  - DEEP believes the best way to improve the efficacy of state and municipal recycling efforts is through implementation of an extended producer responsibility (EPR) program for packaging. The task force heard presentations from Allen Langdon, Director of Recycle BC, which administers an EPR program in the Canadian province of British Columbia, Joachim Quoden from the Extended Producer Responsibility Alliance (EXPRA), which administers a packaging EPR program in Europe and beyond, and John Coyne, of Unilever Canada and Board Chair of the Canadian Stewardship Services Alliance (CSSA) describing their EPR programs for packaging. These programs have set a standard for successful recycling and offer Connecticut a blue print for similar success.
  - The track record of these programs support a finding by this task force that EPR is demonstrated to lighten the cost burden on municipalities while improving environmental outcomes. One way or another, making improvement to recycling programs requires new investment in collection and processing infrastructure, as well as public outreach. These costs should not be borne by municipal or state budgets alone.
  - There was much debate at the task force about what the data tells us about the efficacy of EPR. While DEEP acknowledges the challenge in comparing outcomes between various programs where measures differ, we are satisfied that there was sufficient evidence presented to the task force to conclude that EPR programs have achieved far greater rates of recycling than Connecticut's current system.
  - The task force heard from Mr. Langdon of Recycle BC that in 2016, the province of British Columbia recovered 78% of the packaging material generated and recycled 72%. The cost for the program is \$40 Canadian per household (\$33 USD) which is comparable to the costs for Connecticut's curbside program.<sup>1</sup> The British Columbia program has a much higher recycling recovery rate (72% in British Columbia versus 44% in Connecticut), plus it includes the cost for administration, research and development, and public education, and includes a wider scope of materials. The British Columbia program also includes multifamily units and has logistical challenges associated with a sparsely populated geography. Mr. Langdon estimated the recycling recovery rate to be 55% prior to the implementation of the EPR program.
  - The task force also heard from Mr. Quoden of EXPRA who reported similar success in recycling in Europe using an EPR system. EPR for packaging was first implemented in Europe in 1992 in Germany and has grown to include 25 members<sup>2</sup>. In 2014, 17 European members achieved 60% diversion of packaging or higher through their EPR program<sup>3</sup>. Mr. Quoden stated that, "EPR allows a constant and consistent source of funding that is not totally reliant on government funding." This consistent source of funding is a key for successful curbside recycling.
  - The packaging task force heard [a taped presentation](#) from John Coyne of Unilever Canada, who described the role of EPR in lessening greenhouse gases, creating economic opportunity, promoting the [circular economy](#), and addressing the problem of plastics in our oceans. He proclaimed that EPR is a competitive market solution for

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<sup>1</sup> September 13 task force meeting, Mr. Changaris indicated the per household recycling cost as less than \$40 per household per year.

<sup>2</sup> Joachim Quoden presentation to task force, Aug. 30, 2017

<sup>3</sup> Joachim Quoden presentation to task force, Aug 30, 2017

materials management because it allows the manufacturers to use market forces to create a more successful outcome.

- Reid Lifset, professor at the Yale University School of Forestry and Environmental Studies, presented to the task force in July, 2017 and in response to a question, indicated he did not think it possible to achieve ambitious recycling goals without EPR for packaging.

Table 1 – Comparison of EPR recycling programs to Connecticut

Program	Type	Packaging Recycling Rate	Annual Cost	Includes Multifamily?
<a href="#">British Columbia - Recycle BC</a>	Full EPR	<a href="#">72%</a>	\$276 per ton or \$33 per household	Yes
<a href="#">Belgium – Fost Plus</a>	Full EPR	<a href="#">87%</a>	\$206 per ton <sup>4</sup>	Yes
Germany	Full EPR	<a href="#">71%</a>	unknown	Yes
Connecticut	No EPR - Municipal taxes or subscription	45%	\$120-\$250 per ton <sup>5</sup> or <\$40 per household	No

- Pay As You Throw and Education - Over the past few years, DEEP has made great strides in implementing these strategies, including providing grants to municipalities to implement PAYT, establishing the RecycleCT Foundation to create a statewide educational campaign to promote recycling, and developing a new program for enforcement of recycling requirements for businesses and multifamily housing units (Recycling Enforcement Initiative).
  - Those who advocate that the state or municipalities do more in these areas before pursuing an EPR solution are merely advocating “more of the same.”
  - We believe that EPR is needed as a part of a comprehensive strategy to decrease waste and increase recycling, and all effective approaches, including EPR, should be pursued concurrently.
- Consumer education and awareness efforts aimed at increasing awareness of consumer packaging as solid waste and reuse and recycling solutions for such packaging.
  - We agree that education is a cornerstone of an effective recycling program and would support a task force finding to that effect. We strongly recommend that this task force identify where additional resources for education would come from. An EPR program for packaging would require the manufacturers to administer a comprehensive packaging recycling program. Accepting responsibility for running a program includes promoting that program. The Recycle BC program included a line item in their budget for \$1.5 million for education. EPR provides a stable source of funding for education and promotion that is not derived from taxes.
- Existing methods employed in the consumer packaging and recycling industry to reduce and minimize the amount, weight and volume of consumer packaging that generates solid waste.
  - DEEP supports and embraces a holistic approach that creates incentives to reduce packaging waste, supports the reuse of packaging and increases the collection of packaging materials to be sold as commodities for recycling purposes. The packaging industry presented information to the task force showing that they have made gains in

<sup>4</sup> [Fost Plus website](#). Converted to USD from Euros and to English tons from metric tonnes

<sup>5</sup> Per ton cost based on a sample of Connecticut towns

light-weighting packaging by switching to plastics and other strategies. Ameripen and GMA also pointed out that wrapping of produce helps to extend the shelf life and reduce food waste. DEEP encourages manufacturers to continue to consider designing for the environment when making packaging choices.

- In an EPR program, manufacturers are incentivized to consider the end of life management of the packaging material they use. Moving to a lighter weight material, such as from glass to film, has advantages in source reduction, but many of those benefits can be lost if the package is not recyclable. EPR programs do not seek to ban materials but instead institute higher costs to encourage manufacturers to develop a recycling program for their packaging or to use a more easily recyclable material.
- Incentives for consumer packaging producers to reduce the amount of such packaging that they create.
  - EPR programs provide a market-based incentive for manufacturers to reduce the amount of packaging they use. In the Recycle BC program, for example, a cereal manufacturer who uses paperboard and a plastic film, will pay into the program for each pound of each material placed into commerce. Manufacturers will pay less per pound for materials that have a higher recycling value and will pay more per pound for materials that have a lower recycling value. In order to reduce this cost, manufacturers will consider the weight and recyclability of the packaging material they choose. The program does not seek to mandate which types of materials manufacturers use but incentivizes manufacturers to create less packaging and to choose materials that are more easily recycled.
- Opportunities to cost-effectively increase the proportion of biodegradable, postconsumer recycled and recyclable materials used in the manufacture of consumer packaging.
  - John Coyne of Unilever and the Canadian Stewardship Services Alliance pointed out in his presentation that EPR programs are part of a larger strategy to promote the circular economy which minimizes waste by incorporating recycled material into the next generation of packaging. Recycling ensures a steady supply of the material needed to create the packaging needed by the manufacturers. This creates a closed loop system which is key to the circular economy. EPR programs, which have achieved higher recycling rates than non-EPR programs, create economies of scale because they involve many manufacturers and larger quantities of recovered material. This creates a steady supply of glass, metal, and plastic to be used in the next generation of packaging.
- Strategies for achieving a reduction of not less than twenty-five per cent of consumer packaging in the state's solid waste stream on and after January 1, 2024, and decreasing municipal costs associated with managing such waste stream through the implementation of: (A) Alternative low-cost methods of managing and reducing consumer packaging in an environmentally sustainable manner that additionally yields economic benefits through the creation of job opportunities, or (B) an extended producer responsibility program for consumer packaging.
  - DEEP believes that while there are several strategies for increasing recycling, EPR is the one strategy with a demonstrable record of both achieving maximum recycling rates and decreasing municipal costs. As mentioned above, the task force heard from Allen Langdon and Joachim Quoden, who administer EPR programs in British Columbia and Europe respectively. Both of these programs provide a stable source of funding to promote and enhance recycling while providing a financial incentive to municipalities to participate in the program. Both have achieved high recycling recovery rates for packaging, averaging about 60% in Europe, 72% in British Columbia and 80% in Belgium,

which is significantly higher than Connecticut at about 44%. Recycle BC's program operates at \$33USD per household, less than the \$40 - \$50 per household in Connecticut. If an EPR approach were used to help cover the municipal cost of recycling collection, it could save \$1 million or more to our largest cities.

- With increased recycling comes increased jobs. According to EPA, recycling 10,000 tons of materials would create 36 jobs. The EPR programs in Connecticut for mattresses and electronics have both created jobs. The EPR program in Belgium creates jobs for an estimated 2500 people.<sup>6</sup>
- DEEP supports municipalities voluntarily implementing PAYT as a supplemental strategy for increasing recycling rates. Many jurisdictions that have implemented EPR also employ PAYT to increase the quantity and quality of recyclables. Joachim Quoden supports PAYT to benefit an EPR program by educating residents on the costs for solid waste and the benefits of recycling.
- Connecticut must also confront the recycling challenges of glass in the single stream. Glass in single stream recycling programs is seen by many processors as a contaminant due to the high incidence of breakage. Broken glass is difficult to separate without contamination and therefore recycle into new glass. While EPR programs can accommodate single stream recycling, programs that separate glass achieve higher recycling rates, lower contamination, and higher financial incentives for municipalities. The City of Abbotsford, British Columbia (population 140,000) receives an annual incentive payment of \$1million (\$800,000 USD) from Recycle BC to participate in their EPR program. A condition of participation was that city residents needed to separate glass from other recyclables. The City indicated that although there were some complaints and confusion at the onset, the residents have adjusted and there were no regrets from instituting the changes. DEEP believes an EPR program would offer municipalities that have addressed glass contamination a higher incentive to join thus giving the municipality control over that decision.
- Methodologies for measuring and verifying the reduction described in subdivision (6) of this subsection.
  - Waste characterization studies have given us the most comprehensive data on the nature of our solid waste. Specific to packaging, having Waste-to-Energy facilities conduct a packaging specific characterization analysis would give us the baseline data we need to measure the impact of the measures taken to reduce packaging. These waste characterizations would provide a tonnage of packaging in the waste stream in the baseline year of 2018. Another similar waste characterization in 2024 would provide the data to determine if the measures implemented resulted in a 25% reduction in packaging in the waste stream.
- Incremental performance targets to assure achievement of the reduction described in subdivision (6) of this subsection.
  - A packaging waste characterization study conducted in 2021, midway through the evaluation cycle, could serve as an incremental measure of the impact of the steps taken to reduce packaging waste. The characterization could be financed by the Waste-to-Energy facilities as described above.

## **F. FROM TASK FORCE MEMBER SCOTT CASSEL AND THE PRODUCT STEWARDSHIP INSTITUTE**

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<sup>6</sup> [Fost Plus website](#)

- Reduce municipal waste management costs by shifting costs from taxpayer-funded government programs to the producers and consumers who benefit from the products.
- Reduce waste; increase recycling and reuse.
- Maximize material value, including reducing contamination.
- Create recycling jobs.
- Create incentives for manufacturers to make more sustainable products.
- System Framework Connecticut should seek to put in place a solid waste management system that achieves the following outcomes:
  - Cohesive system that integrates existing related laws, regulations, and programs.
  - An integrated approach, as envisioned by the CMMS, will knit together the current fragmented system and create efficiencies through coordinated approaches that will better focus all system components on achieving common overarching goals.
  - Use of existing recycling and solid waste collection and processing infrastructure.
  - Connecticut has a robust existing infrastructure that can handle more recyclable material. Using this infrastructure will be least costly and least disruptive, creating greater efficiency and system harmonization.
  - Seek no negative impact on haulers or residents choosing private subscription service.
  - One third of Connecticut residents choose their own waste management and recycling services (e.g., not directed by municipal officials). A new system should seek to maintain this structure.
  - All municipalities collect the same materials for recycling.
  - Collecting the same set of recyclables throughout the state will reduce consumer confusion, contributing to higher participation, less contamination, and increased program efficiency.
  - Statewide education that provides consistent messaging to residents and businesses.
  - Consistent statewide messaging will be less expensive and far less confusing than the existing diverse messages delivered to residents solely based on where they live in the state.
  - Full producer payment into the system.
  - Producers are the only entity that can provide a consistent supply of funding needed to reach the overarching goals. This critical role is one of the key pillars to realizing benefits not only to producers themselves (increase in available high-quality recycled feedstock, meeting sustainability goals, etc.), but also to the waste management sector (in the form of recycling jobs) and to municipalities (through reduced costs). Each product sold into the market creates a cost currently borne by municipalities and taxpayers, and not by the companies or consumers, which represents a fairer system. Requiring producers to pay their share of the material they put into the market creates a financial incentive for them to reconsider the materials used in their packaging. Payment should include the cost of collection, processing, education, outreach, and state government oversight and enforcement.
  - Full producer involvement in the collection and processing system, with state government oversight and a multi-stakeholder advisory committee.
  - If producers pay, they need close involvement in the system to maximize efficiency. Such a system can be set up in a way that preserves current norms in Connecticut regarding municipal involvement and hauler operations. A new system of contracting should be set up to account for changes so that brand owners develop contracts for

collection and processing, but offer opportunities to maintain existing hauler relationships, and use existing infrastructure.

- The Connecticut Department of Energy and Environmental Protection should develop regulations that clarify new legislation, and must commit to enforcement against noncompliant companies to ensure a level playing field.
  - Other stakeholders (e.g., municipalities, waste management industry, and consumer/environmental groups) have a significant advisory role to play. These perspectives should be formally incorporated into a multi-stakeholder advisory committee that has a significant voice in brand owner decisions. Continual communication is essential for successful program implementation.
  - Use of systems with a proven track record to achieve Connecticut's overall goals.
  - Many ideas have been proposed in the Task Force meetings, most of which have been tried over the past 30 years by waste management professionals, including myself.
  - The Task Force should seek new and existing systems that have the ability to take Connecticut beyond where it is now.
  - Connecticut should choose systems that have been proven to achieve the overarching goals sought, even if in other places in the world.
  - Connecticut should not be satisfied with recommendations that propose the same strategies tried over the past 30 years, and should not rely on voluntary systems alone. The stakes are too high to leave it to chance or to prolong the process unnecessarily.
- Extended Producer Responsibility (EPR):
  - Connecticut should adopt an EPR system as the central component of its new materials management program. These are the only systems proven globally to achieve the goals Connecticut strives to meet. For example, British Columbia's EPR program achieved a 72 percent recycling rate in 2016. Belgium's recycling rate was 81 percent in 2014 and their program overall creates 2,500 jobs; last year, their packaging recycling system avoided more than 670,000 tons of carbon dioxide emissions.
  - The U.S. is only one of a few countries in the Organization for Economic Cooperation and Development that does not have an EPR for packaging system. Those with EPR systems (some for up to 30 years) include all 28 countries in the European Union, the four largest provinces in Canada, Israel, Brazil, Chile, India, Russia, and numerous other countries. EPR systems are growing worldwide, and are the only systems seriously under consideration by countries seeking to meet overarching goals similar to those set out by Connecticut.
- Continue promotion of Pay-as-You-Throw:
  - PAYT programs promote consumer responsibility through financial incentives. They also rely solely on municipal resources and political will for promotion, acceptance, and passage. These systems exclude producer responsibility and are difficult to pass politically. While they work well to reduce waste and increase recycling, and should be part of any comprehensive waste reduction program, they cannot be relied on independently, or in combination with enhanced existing systems, to reach the state's overarching goals. There are many global examples of PAYT programs playing a complementary role to an EPR system, including Quebec, Ontario, Belgium, and Germany.
- Bottle Bill:
  - Beverage container redemption systems can produce a high quality consistent supply of glass, plastic, metal, and aluminum.

- In addition, the rate of return for beverage containers under a redemption law is three times the rate of non-redemption containers. These systems nationally produce similar results. They provide a strong consumer financial incentive and require partial producer responsibility on one segment of the packaging industry. There are numerous examples globally of the ways in which beverage deposit systems can complement a new EPR packaging system. There are also opportunities to explore ways to reduce duplicative system costs, which have been contentious in discussions of redemption programs. Attention to new handling methods that reduce glass breakage and contamination will maximize system performance.
- Require EPR Programs to Recycle to the Greatest Extent Possible:
  - Connecticut's current law requires municipalities to recycle or be subject to a fine if out of compliance. Although well intentioned, these systems amount to an unfunded mandate for many municipalities whose costs to enhance their recycling system often exceed the financial value to the town. This mandate gets to the heart of the concept of producer responsibility. Taxpayers should not have to pay to manage products put on the market by companies. It makes no sense for taxpayers to continue paying this bill, since under this system there is no incentive for manufacturers to consider the impact of the types of materials they place on the market. Managing those products after consumer use should be the responsibility of the companies because they alone have the ability to alter the materials used in those products, and the materials they use dictate the cost of managing those products—a cost that municipalities currently bear. This is the perspective that Connecticut legislators must come to understand. This is the perspective that other countries around the globe have already realized. Once a new EPR program is put in place, in which producers provide funding into a system they manage to most efficiently collect and process materials they put on the market, it will be reasonable to enforce against municipalities that do not use a new comprehensive recycling system in the manner intended.
- Voluntary Industry Programs:
  - The Recycling Partnership has made significant strides to provide collection carts and technical assistance to municipalities in need. I applaud this effort. However, it is incremental and focused on a limited slice of what is needed to meet the overarching goals set out by Connecticut. Like other programs above, the Recycling Partnership and other voluntary industry initiatives (WRAP plastic film recycling, Closed Loop Fund providing loans to governments, etc.) should be incorporated into a new EPR system. Voluntary programs in the U.S. currently provide a path forward for plastic film (e.g., bags) and other niche products to be melded into a more comprehensive program. They also lay out the foundation for corporate relationships needed to roll out an EPR program. By implementing voluntary programs alone, however, Connecticut has no chance of meeting its overarching goals. This sentiment is echoed by waste management professionals globally. There are numerous accounts of how other countries developed voluntary programs before accepting that the only way to achieve waste management goals is through an EPR system. This is the reason why EPR programs for packaging continue to flourish globally, including recent laws enacted in Brazil and Chile. Connecticut should learn from these countries. The situation in the U.S. is no different than in other countries. Opposition is always expressed by those clinging to the status quo. Once a signal is sent by legislators that change is coming, these companies seek to be part of a new system that reduces the risks of the government passing a law that does not coincide with their interests.



- The Task Force should recommend a process to the legislature that has two discreet phases.
  - This process is the same one used in Canadian provinces to introduce their EPR systems, as well as many other countries around the world.
  - Phase One involves the passage of legislation that sets out parameters for a new EPR system.
  - Phase Two provides the opportunity for stakeholders to collaborate, with the assistance of a facilitator, to develop an EPR system that will best adhere to the framework outlined above.
  - While Phase One provides a strong, clear message to stakeholders that a new system will be implemented, Phase Two allows these stakeholders the opportunity to shape that system to represent their own unique interests. The legislature should set a clear timeframe for the establishment of legislation, and make it apparent that legislation will still be pursued independently if stakeholders refuse to collaborate, or if negotiations fail to achieve a consensus bill.