



Bristol Facility Policy Board

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DATE

Town of Berlin

Mr. Victor Bell

Town of Branford

Mr. Will Flower

City of Bristol

Task Force – Methods for Reducing Consumer Packaging Waste
Legislative Office Building, Room 3200
Hartford, CT 06106

Town of Burlington

Dear Chairman Bell, Chairman Flower & Members of the Task Force:

Town of Hartland

City of New Britain

I am writing on behalf of the fourteen Bristol Policy Board communities served by the Bristol Resource Recovery Facility (BRRF). The facility has been providing waste disposal, energy recovery and metals recycling to our member towns since it began operations in May of 1988. It is a vital component of our municipal waste management infrastructure, operated by Covanta Bristol, Inc. Ten of the fourteen member communities jointly issued a procurement for curbside recycling services in 2014, and presently receive a rebate for recyclable materials delivered under the agreement with Murphy Road Recycling.

Town of Plainville

Town of Plymouth

Town of Prospect

Town of Seymour

We understand that the Department of Energy and Environmental Protection and the Environment Committee are examining methods for reducing packaging waste, and the comments submitted here are in response to interest expressed by the Task Force in receiving comments from stakeholders.

Town of Southington

Town of Warren

I begin by summarizing a number of recommendations and comments:

Town of Washington

Town of Wolcott

1. 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. Handling recovered beverage containers is expensive, and is already subject to capacity constraints in New England; it is suggested this is a more important and immediate problem which needs to be addressed.

2. Connecticut is too small a market to achieve significant savings absent participation in a regional or national extended producer responsibility (“EPR”) compact; fees on packaging have potential to become a regressive tax.

3. There are unresolved questions about whether municipalities would achieve savings, and if so, to what extent; for towns which utilize subscription service, we observed no convincing testimony as part of the hearings or submitted in written comments specifically addressing this issue.

4. 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.

5. 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.

BACKGROUND

Bristol Policy Board member communities benefit from EPR programs in place as a result of legislation promoting recovery of electronics, mattresses, paint and mercury thermostats. We note that EPR is not a perfect solution to responsibly managing these materials, as evidenced by experiences in East Hartford with a defunct mattress recycling operation, and in New Hampshire with a formerly certified electronics recycler operating in violation of state regulations, resulting in a substantial backlog of unprocessed material.

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. Representatives of the organization reported glass is separately collected. Approximately 1,200 producers (retailers and manufacturers) are responsible for paying fees to Recycle BC to cover operating costs, with fees determined by the type and quantity of materials utilized in packaging; small businesses are exempt. Representatives of municipal and regional waste & recycling programs expressed their views that EPR would significantly reduce the cost to taxpayers for recycling and solid waste services.

As noted in presentations offered before the Task Force, Connecticut's largest cities, other than Stamford, lag behind the rest of the state's cities and towns in their ability to maintain recycling rates comparable to suburban communities, since densely populated urban areas are challenged by lack of funding, transient population, and predominance of multi-unit dwellings which traditionally have inadequate provisions for residential recycling. While this was characterized as "low hanging fruit", it seems likely to present a challenge for those communities given the state's current fiscal condition.

In conclusion, we appreciate the diligent efforts by the Task Force to thoroughly vet proposals to introduce packaging EPR in Connecticut, and the thoughtful consideration of testimony and presentations offered by stakeholders.

Thank you for your consideration of this issue.

Sincerely,

Mark H. Bobman

Mark H. Bobman
Executive Director

cc: BRRFOC Member Communities
Robin Bumpen