

Report outline – packaging is also used to warehouse, store, market and transport.

We need 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.

What is the cost of the problem as is? What is the cost to reduce by 25%? Realistic cost of diverting the last ton? Of all the options to improve the waste stream, does this have the most value?

We cannot 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. They will be passed to the consumer. There must be transparency.

Performance targets – how is this measured periodically, weight, GHG, below discussed traits?

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.

A first step would be to determine all the “Packaging” products- corrugated, folding, flexible, glass, rigid plastic, metal, flexible plastics, paper – bags and multiwall containers, plastic wrap, foams, plastic containers, etc.

As for reduction, let the market be the impetus (design, material). Increased packaging can reduce food and product waste. How will that be accounted for? There is enough motivation for cost, innovation, market acceptance, etc. for retailers, package producers and packaging users, I have seen this first hand. Fees will not create enough of an incentive and their fair determination and administrative costs will be a further burden. (Look at the failure of the Walmart scorecard) . Marketing/labeling will add to consumer input into choices and acceptance. Thirty three % of consumers now decide on social and environmental impact.

Reuse can also be market determined. There are inherent cleanliness issues. We also sell plastic returnables as an alternative. As a packaging company, I see the reuse efforts and competition first hand.

Increased recycled content(strength,appearance,printability) should be determined by cost and consumer acceptance in the marketplace. In fact, in corrugated there are structural limitations to recycled content. Forced content in general will create market inefficiencies.

The second step might be to determine what the traits are for each product and determine a strategy for each trait.

Traits – recyclable (easy, hard) economics (good, bad)

Non recyclable

Contaminants

Fuel efficiency

Compostable

Renewable

Sustainable-ghg

Should there be no EPR for recyclable,compostable and fuel efficient materials and others should have EPR?

Increase Recovery-Make the current system better

There is much that can be done!Throwing money at the problem or transferring responsibility is not the solution-more efficiency is.

Determine a plan for each product

All parties to work together-

disposal,collection,consumers,sellers,producers,government

Companies as sponsors for education,bins,etc.-advertise-Use the Recycling Partnership.

More detailed education and labeling on what products and where to put it.

All information is not currently provided on one list-batteries

film,shrink,bulbs,rigid,etc

Educate on value of not doing-environmental impact(water,air ,land),litter

cleanup, disposal.And the consumer pays.

Enforcement – GPS

Supplied containers – size, type, amount-Break down packaging to fit

Pay for volume thrown

Capital investments that have returns - cleaner streams,

enforcement,sorting.Closed end fund and other as a resource.

Reduce contaminants-all glass,sharps

Number of collection streams

Rules for homes, restaurants, business, public space,multi family.

Rules across the state for public/private collection-curent wide variations.

Best practices – rules – statewide committees

Benchmarks, learning – focus where biggest opportunities – metrics – low hanging fruit  
Increase cost, efficiency of recycling infrastructure-capacity?  
Ensure competition  
How to make sure biodegradable is not burned  
E-commerce packaging role – requires additional packaging, touches and rough handling.  
How efficient is our collection process?  
Develop markets for recycled materials where needed – PET etc  
Bottle redemption not working – why? Centralize administration, collect curbside?  
The state is taking the excess money! Where's the transparency? It's a tax!  
Recycled product pricing changes. Need to make flexible. How to return back.  
Consumers have responsibility in choice and disposal!  
Pay as you throw! comparative report like energy bills  
Landfill Bans-cost effective-taxes?  
What businesses are included?

Have a conversation with the recycling partnership! Make goals engineered correctly and realistic. Not using the bottle fund for recycling. Show's the failure of ERP – lack of transparency. Should reduce the bottle fee and add a tax for the difference! Used closed loop fund. EPR not effective – many studies disposal bans on recyclable materials. Label packaging with recycling methods.

## 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. All parties need to be involved.  
Needs to maintain competition.  
Organizing body needs to be efficient.  
Fee determination difficult and needs to be fair.  
No blank checks-must be control over program-revenues and costs.  
Regulation needed and must be enforced.  
Good collection, and disposal ideas the same as in a recycling program.  
Transferring responsibility and funding does not solve the problem.  
Compliant can't subsidize non compliant  
Performance standards  
Larger scale can be a benefit