

Good evening,

Thank you for the opportunity to submit comments to the CT Coalition for Sustainable Materials Management (CCSMM). I have attached the public comments prepared by our organization via pdf.

Respectfully submitted,

Alex Rodriguez

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Alex Rodriguez
Community Organizer | 860-860-6004
alex@ctlev.org



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Connecticut Department of Energy & Environmental Protection
CT Coalition for Sustainable Materials Management
79 Elm Street
Hartford, CT 06106-5127
Via email: deep.recyclingprogram@ct.gov

Thank you for the opportunity to submit comments to the CT Coalition for Sustainable Materials Management (CCSMM).

As an organization, we would like to thank Governor Lamont and Commissioner Dykes again for rejecting the Material Innovation and Recycling Authority's ("MIRA") Annual Plan of Operations for Fiscal Year 2021 as "a false choice, and a bad deal for taxpayers across the state, Hartford residents, and the environment." We applaud the State of Connecticut's refusal to continue providing subsidies to a waste incinerator that has damaged the health of Hartford residents for more than 30 years. In addition to this, we thank DEEP for your engagement of environmental organizations in this discussion. We encourage DEEP and the CCSMM to continue its focus on environmental justice, waste reduction and diversion strategies over disposal by landfilling or incineration.

Per the establishment of your working groups, we agree that *Improved Recycling, Food Scraps/Organics Collection, Unit Based Pricing, and Extended Producer Responsibility* all with an environmental equity lens will effectively address the weight of Connecticut's waste management crisis.

Please consider CTLCV's Zero Waste-focused comments and recommendations below for the report as a whole and the various working groups.

CTLCV is a proud member of the CT Zero Waste Coalition. Zero Waste is considered the conservation of all resources by means of responsible production, consumption, reuse, and recovery of products, packaging, and

materials without burning or discharges to land, water, or air that threaten the environment or human health.

The coalition supports a Zero Waste Hierarchy as a roadmap to recapturing valuable materials and their economic value, and maximizing jobs while minimizing health and environmental impacts. Incineration in Connecticut is a serious issue of environmental racism, with the two largest waste incinerators in highly populated, low-income communities of color. At the same time, exporting trash to out of state landfills is not a suitable long-term waste management solution. Out-of-state landfilling should only be viewed as a temporary, short-term necessity, while a comprehensive in-state waste management strategy that does not rely on high-heat waste incineration is developed. The Zero Waste emphasis on prohibiting incineration will help the state reach its environmental justice goals.

Improved Recycling

A vital way in which our state can improve recycling is to modernize the Bottle Bill as a critical piece of our waste infrastructure. The program carries multiple economic and environmental benefits for our state, including saving municipalities millions and preventing pollution that threatens our communities, waterways, open spaces, and climate. Unfortunately, the handling fee for containers has not kept pace with the expense of recycling or inflation, and redemption centers continue to close their doors across the state as a result.

There are three key components to modernizing Connecticut's bottle bill: increase the handling fee, increase the deposit from 5 to 10 cents, and expand the bill to include non-carbonated beverages such as juices, teas, sports drinks, wine and liquor. Increasing the handling fee will encourage new redemption centers to open, helping to relieve municipalities of the rising cost of recycling.

Increasing the deposit will raise redemption rates as it has in other states. CT's redemption rate currently hovers around 51% while states with a 10-cent deposit have increased their rates to around 90%.

[Currently, beverage containers account for 40% of litter.](#) Deposit systems are a proven, effective solution that have the potential to reduce beverage container litter by up to 84%. Expanding returnable beverage types will update the bill to match today's growing beverage market while adding an

additional 193 million containers to the program each year, thereby increasing good recycling habits and creating a market for container litter within our communities.

In addition to mitigating plastic waste in our environment, a modernized Bottle Bill would create 1,272 jobs throughout the state & add about \$92 million annually to the local economy. Modernizing the program would go a long way to increase the efficiency and quality of recycling in Connecticut, create green jobs, and clean up our communities - all while saving taxpayers and municipalities money.

Food Scraps/Organics Collection

Public Act 11-217, the [commercial organics ban](#), should be amended to strengthen its effectiveness, to aid in the state's goals of increasing recycling rates, improving public health, and building the infrastructure for sustainable waste management. Food waste makes up about 20-25% of the waste stream and is the largest recyclable material stream that we don't currently separate from trash at a significant scale. Advocates would like to see the following recommendations for how to handle food waste and organics collection in Connecticut.

Geographic Requirements

Currently PA 11-217 only applies to food waste generators within 20 miles of a composting facility in CT. This should be extended statewide since there is no scientific or economic reason for this arbitrary distance. Currently, trash and recycling haulers cover much longer distances - there is no reason food waste can't also be done this way. [There are three Food Residual Composting Facilities and one Anaerobic Digestion currently operating that can support this effort.](#)

Exemptions

PA 11-217 as it stands only applies to commercial food wholesalers and distributors, industrial food manufacturers or processors, supermarkets, resorts, and conference centers. This exempts universities, hospitals, restaurants, long term care facilities, food courts, and stadiums, among other entities. By leaving these other types of institutions out, the law is not nearly as effective as it could be in diverting large amounts of organics from the waste stream.

Expansion

In 2020 the ban was expanded from qualified entities generating at least 2 tons of food waste a week to 1 ton per week. This adjustment should continue to 1/2 ton per week by 2023 - the year that the incinerator in the South Meadows is predicted to stop operating. 1/2 ton is still above what most small businesses generate weekly and [will help CT in its struggle to meet its waste reduction goals](#).

Enforcement

There are no penalties for non-compliance under the current commercial organic waste ban. While we don't advocate for DEEP to use a punish-first approach, we do believe that they should be able to have that power to enforce the law. Sending vast amounts of food to landfills and incinerators, adds to air pollution, further degrading CT's air quality. Stricter enforcement is needed to protect public health and meet waste reduction goals..

Funding

If we are going to take our waste problem seriously, there need to be adequate resources provided to enforce this ban. An update to the commercial organics ban needs to earmark funds for full time inspectors.

Hauling organics is cost comparable or cheaper than trash if done with scale. We are confident that implementing these amendments to the Public Act would not make it harder for small businesses in the state to comply and would not raise their prices for hauling. In fact, these changes will improve the quality of life for all residents in the state, because we'll have a healthier environment, more jobs, and lower cost services.

Unit Based Pricing

According to [Skumatz Economic Research Associates \(SERA\)](#), Unit-Based Pricing, also known as 'pay as you throw' is an effective and cost-effective way to quickly reduce waste. These programs have a near-immediate effect on behavior that can help Connecticut meet its 60% solid waste reduction goal. Unit Based Pricing prioritizes source reduction and reuse, saving municipalities money on collection, recycling, and waste disposal. [Every ton composted instead of landfilled or incinerated saves an average of \\$33 that](#)

[the municipality need not pay](#). The CT Zero Waste Coalition previously recommended a pilot program working through regional solid waste authorities and Councils of Government to establish unit based pricing models in strategic communities; noting that public engagement has been a barrier to establishing these programs in Connecticut and that the state should ensure ample public education as a key component to the roll out.

Extended Producer Responsibility (EPR)

EPR is important to implement correctly. As stated in DEEP's [EPR Working Group slides](#), the benefits of EPR include municipal savings, efficient and increased recycling of products. It also helps reduce litter, illegal tire dumping, greenhouse gas reduction, and supports job creation. The cost of everyday products does not account for the environmental impacts of production and disposal. We support EPR as it incentivizes producers to re-design products so that they are easily recyclable or reusable, thus reducing those recycling costs otherwise borne by municipal governments.

As stated, we encourage DEEP and the CCSMM to take all of our Zero Waste-focused recommendations into consideration when planning for the future of waste management in our state. Thank you for the opportunity to submit comments on the draft working group reports.

Sincerely,

Alex Rodriguez

Community Organizer
Connecticut League of Conservation Voters
533 Farmington Ave, Suite 201
Hartford, CT 06105
860.236.5442
alex@ctlcv.org
www.ctlcv.org