

August 27, 2021

Connecticut Department of Energy & Environmental Protection  
Mr. Chris Nelson  
79 Elm Street  
Hartford, CT 06106-5127

Public Comment on DEEP Implementation Public Act Act 21-58

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Dear Mr. Nelson,

Thank you for the opportunity to comment on Public Act 21-58. Ardagh Glass Packaging – North America operates 14 glass plants in the United States, employing over 4,000 people. We produce infinitely recyclable glass packaging for the wine, beer, food, and spirits producers of the United States. Many of the packages we produce are covered in, or will be covered in, Connecticut's Bottle Bill.

Of the tentative objectives listed in the proposed implementation of the Act, ensuring that recovered materials are used for their highest and best use is critical to Ardagh. Clean recycled glass ("furnace-ready cullet") is used in our production: emissions per ton of production are reduced with increased levels of recycled glass used. Glass packaging made from post-consumer glass itself is infinitely recyclable, meaning more recycled glass, again and again, in the processing system, a truly circular use of processed glass

Ardagh supports the proposed non-profit Bottle Bill Stewardship Organization. The organization, once created, should hold public meetings obtain input from interested parties (such as industry associations or other states' Subject Matter Experts) on matters involving policy positions, organization structure, and best practices for Bottle Bill Stewardship.

As referenced above, Ardagh uses "furnace-ready cullet" for its glass packaging production, packaging that can be used and recycled infinitely. In Section 8 of the Act, we would emphasize the circularity benefits, and availability, of processing of wine and liquor glass into "furnace-ready cullet". The processing facilities should be required to be able to produce furnace-ready cullet and engage purchasers of such material, such as Ardagh. Additionally, to assist in achieving the recycling percentage goals, the Act should provide provisions that would facilitate the collection of such wine and liquor containers for recycling, such as funds for providing drop-off bins in municipalities and other major locations accessible for wine and liquor consumers, such as on-site at wine and liquor retail establishments.

Finally, regarding Section 8, many glass processing sites may have difficulty isolating and tracking volumes and processing activities exclusively for wine and liquor containers. Wine and liquor containers could be co-mingled with other recyclable glass packaging, such as glass food and non-covered glass beverage containers, that are equally as recyclable. Discouraging the acceptance and processing of other glass materials which can be processed for beneficial uses could be an unintended consequence that will not be beneficial for overall recycling rates. We ask that reporting requirements be reasonable and not discourage recycling other forms of glass.

Thank you again for this opportunity to comment.

Kind Regards,

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