




CONNECTICUT PACKAGE STORES ASSOCIATION

 **CPSA**
455 Boston Post Rd, STE 203B
Old Saybrook, CT 06475

 860.346.7978
 860.343.0014
 CTPSA.COM



Executive Director
Jean M. Cronin
jcronin@hughesandcronin.com
Assistant Director
Sean Hughes
shughes@hughesandcronin.com
Program Director
Mallory Daley
mdaley@ctpsa.com

To: Commissioner Katie Dykes
Mr. Chris Nelson
From: The Connecticut Package Stores Association (CPSA)
Re: Stakeholder comments on items included in PA 12-58

The Connecticut Package Stores Association (CPSA) represents over 1,250 independently owned retail package stores across the state. The association was not only a stakeholder in the bottle bill since its inception, but provided integral input throughout its development. CPSA appreciates the opportunity to provide input on Public Act 21-58 and Public Act 21-2, as it pertains to package stores and other members of the beverage industry.

When the original bottle bill legislation which created, it was intended to address concerns related to litter. Due to beer bottles and cans being single-use, they were being littered at a much higher rate than other containers, and were thus included in the bottle bill. Throughout the years, there have been minor changes to the statute, but the redemption process through package stores has largely remained the same.

The passage of PA 21-58 was the largest change to the bottle bill to-date, including the addition of new beverages and doubling of the redemption fee in 2024. CPSA and its members testified at the public hearing on the bill and expressed both support and concern regarding various aspects of the proposal, including the proposed addition of wine and spirits bottles to the list of bottle bill containers.

According to state statute, Connecticut package stores are only allowed to sell a certain number of items, mainly beer, wine and liquor. Beer bottles and cans are already redeemable, due to their aforementioned single-use nature. All package stores, large and small, have to designate entire sections of their stores to the handling of cans and bottles returned by customers. As most package stores in Connecticut are small, many are already struggling to keep their current retail floor space separate from the returned containers, due to space and staff limitations. Simply put, package stores do not have the physical space to redeem all of the bottles that they sell.

In addition to concerns of physical space, there are more complicated implications that arise from the inclusion of wine and spirits bottles in the bottle bill. Many package stores receive deliveries of the same brands of wines and spirits from different wholesalers. This creates confusion as to which wholesaler would be required to collect the empty bottles from the package store, after they are redeemed by the customer. The redemption system was never intended to collect these types of bottles because they were never a big part of the litter issue, which the bottle bill was created to address. The overwhelming majority of wine and liquor bottles end up in residential or commercial recycling bins.

During the 2021 legislative session, the three-tier system worked to address the litter issue caused by 50 ml liquor bottles, or “miniatures.” A proposed deposit with a redeemable value was untenable for several reasons, including

the fact that reverse vending machines are not able to accept them, package stores do not have the space to collect them, and the containers are often crushed and cannot be identified to be properly redeemed.

The solution to create an “environmental fee,” also known as an advanced disposal fee (ADF), was proposed to fund the collection and processing of the miniature bottles. Beginning October 1st of this year, the industry began collecting a 5 cent fee on every miniature liquor bottle sold. In April of 2022, the funds collected will be distributed to the towns and cities in which the containers were sold. The hope of the three-tier entities is that each municipality will use the funds to invest in organized environmental cleanups, the promotion of recycling programs, and the creation of new programs to address all forms of litter and other recycling issues.

CPSA believes that a stewardship model is the best way to address the glass recycling issue in Connecticut. The model should be created in collaboration with all members of the three-tier system and any additional stakeholders. The stewardship organization should also be flexible to address changes in the alcohol beverage industry, as certain members are already developing their own materials management plans.

We thank DEEP for the opportunity to submit comments on this process, and look forward to the continued involvement of all three-tiers of the alcohol beverage industry in any future developments.

Best regards,

Jean Cronin

Executive Director

CT Package Stores Association

455 Boston Post Road, Suite 203B

Old Saybrook, CT 06475

Office: (860) 346-7978

jcronin@hughesandcronin.com