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BeerInstitute.org

December 4, 2024

Ms. Katie Dykes
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Sent via electronic mail to: DEEP.MMCAPanning@ct.gov

Dear Commissioner Dykes,

The Beer Institute (BI) thanks the Connecticut Department of Energy and Environmental Protection for the opportunity to comment on the revocation of the August 2022 order to allow the use of “CTRV” labeling on bottles. The BI is a national trade association representing the American beer industry, including brewers, beer importers and industry suppliers. This vibrant manufacturing sector supports nearly 2.4 million jobs and provides more than \$409 billion to the American economy.

Since the August 2, 2022 [order](#) that approved “the embossing, stamping, labeling, or securely affixing to a beverage container the words “Redemption Value” or the abbreviation “CTRV,” stakeholders have modified their packaging to adhere to the order. Changing labels is not as simple as flipping a switch. This project imposed significant costs on our members, required complex coordination with supplier partners and took months to complete. To disallow the use of “CTRV” at this time would require yet another update to these label sets just months after they were changed.

Other states have recognized the efficacy of similar “RV” labeling. California, for example, has used the “California Redemption Value” (CRV) labeling since the inception of its bottle bill in 1986. Maine also recently allowed for the use of “RV” labeling in 2023. The \$0.10 deposit has been in effect in Connecticut for less than a year. That is less than one year of consumer education and data collection on the impacts of the increased deposit and the “CTRV” label.

For these reasons, the BI believes that the decision to terminate the use of “CTRV” at this time is premature and would cause undue hardship for beverage producers and their suppliers. Instead, ongoing public education on the recent bottle deposit program changes can focus on the “CTRV” label and what it means for consumers.

While the BI respectfully requests that the termination of the use of “CTRV” be reconsidered, if the rescission does move forward, we would request the maximum time possible to allow for labels to be transitioned to “CT 10¢” in the normal course of business rather than a costly special project. The BI requests that the minimum time for labels to transition be no less than three years.

We appreciate the opportunity to comment on this matter.

Brian Crawford
President & CEO
Beer Institute