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December 4, 2024

Ms. Jennifer L Perry, P.E.
Bureau Chief
Materials Management and Compliance Assurance
Department of Energy and Environmental Protection
79 Elm Street
Hartford CT 06106-5127

RE: Feedback on revocation of use of "CTRV" on covered containers

VIA EMAIL: DEEP.MMCAPlanning@ct.gov

Dear Ms. Perry:

The Can Manufacturers Institute (CMI) appreciates the opportunity to provide comments on the Department of Energy and Environmental Protection's (DEEP) proposal to revoke the use of "CTRV" on covered containers. CMI is the U.S. trade association representing metal can manufacturers and their suppliers. Our member companies make aluminum beverage cans subject to Connecticut's Bottle Bill program. They are proud to make beverage containers that deliver high economic value to recycling programs and are highly recyclable.

CMI asks the Department not to revoke the ability to incise the can lid with "CTRV." Changing the deposit redemption incising message requires expensive tooling and manufacturing changes. The supply chain would face higher costs and sustainability impacts, from canmakers to brand owners, distributors, and retailers. There will be significant increases in input costs. Unless there is a significant "sell through" period of two years, products in the distribution chain will be wasted, contributing to product waste. This has an unintended impact on the sustainability goals of brands. Smaller beverage brands would face considerable impacts as they cannot absorb those losses to their margins.

Additionally, the decision to go with "CTRV" was made because the redemption value could change at some point in the future. "CTRV" was intended to be a forever stamp. Any future changes would result in future costs and losses (mentioned above) again at a later date.

The Need for Label Flexibility

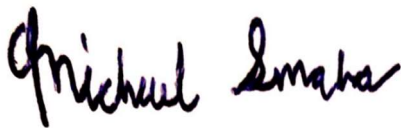
If DEEP moves ahead with revoking the use of "CTRV," CMI urges the Department to allow the printing of the deposit redemption information message on the side of the can. There is not enough room to incise "CT 10¢" on the lid. "CT 10¢" requires an additional six spaces, incised

on the lid, versus four letters needed with “CTRV.” Allowing this information to be printed on the label makes sense because as the amount of space on the lid shrinks, the size of the lettering and numbers shrinks too. Eventually, it will become too difficult for consumers to read, which defeats the purpose.

DEEP can address this situation by amending [section 22a-245-3\(b\)](#) and striking the requirement on metal containers that they be “embossed or stamped with the required labeling on the top of the container.” Allowing the refund information to be printed on the can’s label makes it easier for can makers and their customers to comply with changes in the state’s refund value. For example, “CT 10¢” could be combined with Oregon, so “CT-OR 10¢” could be printed on the label. Consumers could read that the deposit value in Connecticut is 10 cents. If the information must be included on the lid, using “CT10,” which only requires four spaces, is an alternative you could consider.

Thank you for considering our comments. We are available to answer any questions and provide additional information.

Best regards,

A handwritten signature in black ink that reads "Michael Smaha". The signature is written in a cursive, flowing style.

Michael Smaha
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Can Manufacturers Institute
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