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Sent: Tuesday, December 3, 2024 4:16 PM
To: MMCAPlanning, DEEP <DEEP.MMCAPlanning@ct.gov>
Subject: Bottle Deposit Labeling - CTLCV Comment

Commissioner Katherine Dykes

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

Dear Commissioner Dykes,

The CT League of Conservation Voters urges the Department to rescind the 2022 Order that allowed “CTRV” labeling on redeemable containers, and to establish a one-year timeframe for all deposit beverage containers to again be labeled “CT 10¢”.

One year from the date of rescinding the Order should be enough time for beverage manufacturers to update their labels and for retailers to sell existing “CTRV” inventory.

Every year, Connecticut’s **‘Bottle Bill’** program keeps at least 717 million cans and bottles out of our neighborhoods, water bodies and waste incineration facilities and recycles it back into new products.[i] The program, which provides a financial incentive for the public to recycle rather than litter, has been the state’s most effective recycling and litter prevention program. At one point, close to 90% of cans and bottles eligible for a deposit refund were redeemed and recycled each year.[ii] As the value of nickel deposit decreased so did the program’s collection rate – to the point where Connecticut had the second lowest return rate of all states with a bottle bill.[iii]

Thanks to the legislature’s leadership, the state has taken steps to revitalize the current program, namely reinvesting in making the program more convenient, making more beverages eligible for a recycling refund, and increasing the deposit to ten cents. The changes are starting to work. Total recycling volume in the bottle deposit system is up 30%, the number of return locations available to the public has doubled and small business owners have opened 12 new redemption centers so far.[iv]

However, people need to know what is eligible for a refund if the program is to succeed in reducing waste. Due to the weakening of the labeling requirement on deposit containers we are concerned that consumers remain confused as to what is eligible for a recycling refund. This is unfair to consumers who have a right to get their deposit money back and it is holding back the potential environmental benefits of the system as a whole. **We are calling on DEEP to reinstate the original labeling requirement so all deposit containers show “CT 10¢” on the label.**

Prior to the deposit changing to 10¢, DEEP issued an order allowing beverage companies to label their cans and bottles with “CTRV” [v] instead of “CT” and the deposit value (10¢) as has always been the law.[vi] The order notes that the goal was to avoid “potential supply chain disruptions” as we emerged from the pandemic. The order also noted the importance of educating the consumer. Unfortunately, no such, ongoing and effective education program explaining the meaning of “CTRV” has taken place. By now, the supply chain has

returned to normal. Yet, consumers in Connecticut today could not tell you what CTRV means. This has real world impacts. Given the program has made beverage categories like juice and sports drinks eligible for a recycling refund for the first time, this confusion means Connecticut consumers are potentially unwittingly giving up \$32 million in deposits each year. That's \$32 million that could be going towards groceries and millions of containers that municipalities are paying to dispose of.[vii]

While we recognize changing labels will come at a cost to beverage companies, we also note that the **legislature has given back up to 95% of the unredeemed dimes to the beverage industry** for costs like these.[viii]

Thank you for considering these comments.

Lori Brown
Executive Director
CT League of Conservation Voters

[i] ["CT Bottle Redemption Data."](#) Connecticut Department of Energy and Environmental Protection (DEEP). 2021.

[ii] ["Roadside Litter Control: A Survey of Programs and Practice,"](#) University of Maryland, Maryland Transportation Technology Transfer Center. 2001.

[iii] ["Redemption Rates and Other Features of 10 U.S. State Beverage Container Deposit Programs Prepared by the Container Recycling Institute,"](#) Container Recycling Institute. 2024.

[iv] ["Bottle Bill Advisory Group,"](#) DEEP. October 2024.

[v] ["Order,"](#) Commissioner Katherine Dykes. 2022.

[vi] ["Public Act 21-58,"](#) [CGA.CT.Gov](#). 2021.

[vii] "Connecticut Beverage Market Data Analysis," Container Recycling Institute. 2020. Approximately 320m cans and bottles of new deposit beverage categories were sold in Connecticut in 2019.

[viii] ["Unclaimed Bottle Deposits,"](#) Office of Legislative Research. 2023.



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