



December 4, 2024

DEEP.MMCAPlanning@ct.gov

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

Re: Revocation of the Commissioner's 2022 Order allowing the use of "CTRV" for beverage labeling purposes under the bottle redemption program

To Whom It May Concern:

The following are comments from the Environmental Products Corporation ("Envipco") in response to the Connecticut Department of Energy and Environmental Protection's (CT DEEP) request for feedback on the Commissioner's plan to revoke the 2022 order allowing the use of "CTRV" as a general label on beverage containers subject to the Connecticut bottle bill law.

Envipco is a leading reverse vending machine technology company with more than four decades of experience providing Reverse Vending Machine (RVM) technology for all sizes of dealers and redemption centers – from small to large – with customized recycling solutions. Envipco's North American operations are headquartered in Naugatuck, Connecticut where we manufacture and service our reverse vending machines. Envipco employs more than 100 people out of its Connecticut facility.

Envipco supports the Commissioner's revocation of the earlier order in the interest of consumers, whose informed participation in the program is critical. As CT DEEP noted in its request for feedback, the use of "CTRV" has served as a useful option during both the expansion period for covered beverages and the deposit increase to 10 cents, by giving beverage companies relief from costs associated with two consecutive years of labeling changes. It has been just shy of one year since the last program change took effect. Beverage companies are assured that no additional changes will occur and the process of updating product labels can begin.

While useful for practical business purposes, the "CTRV" marking makes little sense to the average consumer. When the consumer has no defined price signal for a container's redemption value, the consumer will be less likely to assign it a value. This universal truth serves as the entire basis of the increase in container redemption value from 5 cents to 10 cents. Clearly, until containers specifically label the redemption value with 10 cents, consumers will infer that the redemption value is still 5 cents, making them less likely to redeem their containers.



Envipco recognizes that the timing to update labeling can vary from beverage company to beverage company and that the label changing process must allow for reasonable inventory rotation time so that beverage companies can mitigate losses from any saleable products not properly labeled. In past discussions on the matter, beverage companies sought from 12 to 18 months to complete the labeling change without losing excessive inventory. This seems a reasonable timeframe, recognizing that until the 10 cents redemption value label is updated, the bottle redemption program will continue to underperform its potential.

Thank you for the opportunity to comment on this important decision to revoke the CTRV order by the Commissioner. Envipco will continue to be a constructive partner with CTDEEP and other stakeholders in Connecticut to make the CT bottle bill successful.

Sincerely,
Tina Bergers, President
Container Collection Services
Envipco
99 Great Hill Road
Naugatuck, CT 06770