December 4, 2024

Via Email
Jennifer L Perry
Bureau Chief, Materials Management and Compliance Assurance
Connecticut Department of Energy and Environmental Protection
DEEP.MMCAPlanning@ct.gov

RE: Just Zero Supports the Revocation of the August 2, 2022 Order Allowing the Use of "CTRV" in Beverage Container Labeling

Dear Bureau Chief Perry:

Thank you for the opportunity to submit comments regarding Commissioner Dykes' plan to revoke the August 2, 2022 order approving the use of the words "Redemption Value" or "CTRV" for the purpose of identifying beverage containers that may be redeemed for a refund under Connecticut's deposit return system, or "bottle bill." **Just Zero supports the revocation of this order and urges the Department of Energy and Environmental Protection to require all deposit containers to be labeled "CT 10¢" within one year of the revocation.**

Just Zero is a nonprofit organization that works across the country, including in Connecticut, alongside communities, policy makers, and others to implement just and equitable solutions to climate-damaging and toxic production, consumption, and waste disposal practices. We believe that all people deserve Zero Waste solutions with zero climate-damaging emissions and zero toxic exposures.

Connecticut's Bottle Bill is one of its most effective recycling and waste reduction programs. Bottle bills lead to higher diversion rates, higher recycling rates, less litter, and more jobs than curbside recycling.[1]

[1] *See* Jenny Gitlitz, Container Recycling Institute, *Bottled Up: Beverage Container Recycling Stagnates (2000–2010)* 7–10, 24, app. A (2013), https://www.container-recycling.org/images/stories/PDF/BottledUp-BCR2000-2010.pdf; NAPCOR, *Report on Postconsumer PET Container Recycling Activity* 14 (2018), https://napcor.com/wp-content/uploads/2018/11/NAPCOR_2017RateReport_FINAL_rev.pdf; Container Recycling Institute, *Litter Studies in Bottle Bill States*, https://www.bottlebill.org/index.php/benefits-of-bottle-bills/litter-studies-in-bottle-bill-states; Sarah Edwards, Eunomia Research and Consulting, Inc., *Employment and Economic Impact of Container Deposits* table E1, E2 (2019), https://www.eunomia.co.uk/reports-tools/employment-economic-container-deposits-ny/.

For the state's Bottle Bill program to operate as effectively as possible, it is crucial that Connecticut consumers clearly and easily understand the deposits paid on, and refunds available for returning, deposit containers. "CTRV" is less clear, less easily understood, and less informative than a label that includes both the deposit value and "CT." Eight of the other nine states with Bottle Bills require labels that include the deposit value – California is the lone exception. Connecticut has long required the inclusion of the deposit value on container labels. Consumers deserve transparency, and the success of the Bottle Bill – again, on of Connecticut's most effective recycling programs – depends on a shared understanding of which containers have a refund value.

A one-year period between revocation of the 2022 Order and a return to the requirement that all deposit containers be labeled with "CT 10¢" is more than sufficient time for beverage manufacturers to update the labelling and for the sale of existing containers that include the "CTRV" label. **Just Zero urges the Department to stand by the Commissioner's plan to revoke the 2022 Order and to impose a one-year deadline for the transition to a "CT 10¢" labeling requirement.**

Sincerely,

Kevin Budris
Deputy Director
Just Zero