

December 4, 2024

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

Regarding “DEEP requesting feedback on revocation of use of ‘CTRV’ on covered containers”

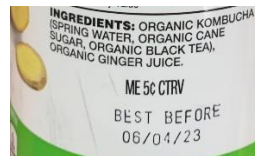
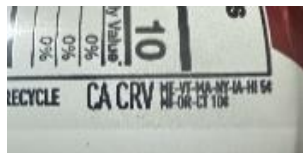
Dear Bureau Chief Perry:

TOMRA appreciates DEEP’s continued engagement and oversight of Connecticut’s Beverage Container Deposit and Redemption Law. The program’s impact to reduce litter and increase recycling is meaningful.

Transparent labeling and communication of the deposit value is the intention of the statute – for good reasons:

- 1) The deposit amount charged must be clearly communicated to the consumer at the point of purchase.
- 2) The State and beverage brand owners have an obligation especially because each keeps a portion of the unredeemed deposits.
- 3) For the deposit to act like a meaningful incentive to redeem, consumers need to know the value of their deposit. When shopping – and away from the store.

There is no specification for how CTRV is to appear on the label. There are many examples of CTRV being printed next to the ‘5¢’ indicia. And others printed next to the ‘10¢’ indicia used by Michigan (MI) and Oregon (OR).



Our understanding of ‘CTRV’ was that it would be a temporary option to assist beverage brand owners by allowing a cost-efficient transition of the deposit from 5 to 10-cents, if needed.

We support DEEP asking stakeholders for ideas to transition out of using CTRV, and done the same, speaking with a number of brand owners about the process of changing labels and the costs involved. We ask that brand owners be given an option that allows them to do so cost-effectively in the course of their regular product management, and suggest that they be afforded the time to:

- revert to the statute’s requirement (‘CT 10¢’) as any brand updates their labels in the due course of business to December 31, 2026 (24-months); and
- promote the program to consumers, making it clear that the deposit is worth 10-cents.

Please reach out with any questions you may have.

Thank you,

Mike Noel
Public Affairs Director, TOMRA