



July 16, 2021

**DEEP Implementation of Public Act 21-58: Bottle Bill Modernization
NOTICE OF PROCEEDING, SCOPING MEETING AND AN OPPORTUNITY
FOR PUBLIC COMMENT**

Comments from Environmental Products Corporation (Envipco)

The Environmental Products Corporation (Envipco) appreciates the opportunity to respond to Department of Energy and Environmental Protection's (the Department) Opportunity for Public Comment on the implementation of Public Act 21-58: *Bottle Bill Modernization*, issued on July 16, 2021.

Envipco is a Connecticut manufacturer headquartered in Naugatuck. Our manufacturing facility and technical services operations provide Reverse Vending Machine (RVM) redemption service technology to more than 125 retail locations, with more than 600 points of redemption for the public. Envipco depends on the bottle bill, which is recognized worldwide as the most effective and efficient means of beverage container recycling and litter reduction via container redemption programs. Envipco's operations contribute to the state economy not only in direct manufacturing and technical services jobs but through its support of locally-based vendors. Each year, Envipco purchases millions of dollars of vendor goods and services from other Connecticut businesses.

Envipco knows that the existing operator model is not the cause for recent past underperformance in bottle bill program participation, but rather dated provisions in the current model need modern improvements. All these improvements are clearly addressed within separate provisions of the Public Act. Specifically, the Public Act addresses the three key cause factors of current system underperformance:

- 1) Cause Factor #1: Insufficient deposit coverage over new age beverages
 - a) Corrective action: Expansion to modern beverages
- 2) Cause Factor #2: Insufficient deposit value incentive
 - a) Corrective action: Deposit doubled to a dime

3) Cause Factor #3: Insufficient redemption outlets and lack of consumer convenience especially in underserved communities.

a) Corrective Action: Redemption infrastructure expanded with RVM redemption automation to 7,000 Sq ft dealers along with grant support though the budget process for Redemption Center startups.

As a result of the thoughtful and comprehensive upgrades to the operator model in the Public Act, Envipco is skeptical that a new "stewardship model" will do nothing more than create confusion and lead to uncertainty in the program, risking continuing performance issues due to this uncertainty and threatening the investments made to modernize the system as prescribed by the Public Act.

-Changes must not be made to the operator model so as to protect the ownership of the existing infrastructure, as well as the contracts executed with and by other parties invested in the current system. At a minimum, any changes to the operator model should only be considered once the full scope of modernization solutions have been implemented and evaluated for performance effectiveness.

Thank you for the opportunity to provide comments to the Department on this critical issue. Envipco stands ready to work with the other stakeholders and the Department to implement the provisions contained in the Public Act and modernize Connecticut's bottle redemption system.

Sincerely,



Michael Wellman, President
Container Redemption Services
Envipco