



August 27, 2021

Chris Nelson  
Connecticut Department of Energy and Environmental Protection (DEEP)  
79 Elm Street  
Hartford, CT 06106

**Re: Comments on Implementation of Public Act 21-58: *Bottle Bill Modernization***

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Dear Chris:

On behalf of the Glass Packaging Institute (GPI), I am pleased to provide information relevant to questions outlined in the Scoping Meeting document pursuant to Public Act 21-58.

GPI is the North American trade association for the glass food and beverage manufacturing companies, glass recycling processors, raw material providers and other supply chain partners within the industry. GPI and its members work closely with local and state governments throughout the country on issues surrounding sustainability, recycling, packaging manufacturing and energy use.

**Glass Container Recycling Background**

Glass is a core, circular packaging material - reusable, refillable and endlessly recyclable. Public sentiment and surveys consistently place glass near the top of all recyclable packaging, understanding its recyclability, and as important, expressing a desire to continue glass recycling and keep it out of the landfill.

The glass container manufacturing industry has a significant stake in the effectiveness of glass recycling programs. For every 10% of recycled glass included in the manufacturing process, energy costs can be reduced 2-3 percent, with additional corresponding reductions in greenhouse gas emissions for every 10 percent recycled glass remelted to make new containers.

The glass container industry is serious about utilizing recycled glass as part of our manufacturing processes. The U.S. glass container industry purchases about 2.3 million tons of recycled glass each year with an average of over 25% post-consumer recycled glass as part of the manufacturing batch mix.

**Glass Recycling and Recovery in Connecticut**

Glass bottles redeemed through Connecticut's bottle bill program are part of a critical supply chain in the manufacture of glass containers. Connecticut's bottle bill program has higher than average glass container recovery rates, is generally free of contaminants, and in high demand. The most current redemption rate numbers are north of 50%, highlighting the

importance of the program. Our industry values the quality recycled glass recovered from the program.

Quality and contamination are the key determiners factors for the value and potential end-markets for recycled glass. While glass can be recovered from single stream recycling programs, if the materials recovery facility that it is going to has not made the necessary investments to update their sorting/recapture equipment, much of that glass yield is lost to landfill disposal, alternative daily cover, or lower-value one time applications.

**DEEP’s Tentative Objectives for Relevant Sections of Public Act 21-58**

The requirement to modernize Connecticut’s beverage container deposit program touches on a key area for glass container manufacturing and recovery, as noted below:

**Collection and Processing of 80% of Spirits and Wine Bottles Sold In-State**

GPI and its members will work to support this initiative, as two of our industry’s primary customer end markets develop paths forward to achieve higher recovery rates. However, and as noted in our earlier comments, we would place reduced glass contamination measures front and center of this objective.

There are several avenues (outside of single stream and container deposit program collection) where more glass from these industries could be effectively captured and re-melted into new containers. For example, drop-off, take-back and separate curbside bin collection programs exist throughout the country, and could be explored as options within Connecticut. In order to achieve an 80% percent collection and processing rate for wine and spirits containers, it is our perspective that an industry-supported, purposeful collection program would need to be considered and developed in a cooperative and collaborative manner among all relevant stakeholders.

GPI supports quality over quantity when it comes to glass and broader recycling collection practices. Connecticut is fortunate to have a glass processing company in-state (SMI, South Windsor) that plays a significant role to ensure that glass collected is processed, sorted and recycled back into glass and other product markets.

Thank you for your consideration of our comments on Connecticut’s container deposit program and potential path forward for quality and effective glass recycling and recovery. We look forward to our continued engagement, as part of the stakeholder process.

Sincerely,



Scott DeFife  
President