



SOUTH CENTRAL REGIONAL COUNCIL OF GOVERNMENTS

Planning for Our Region's Future

Bethany Branford East Haven Guilford Hamden Madison Meriden Milford
New Haven North Branford North Haven Orange Wallingford West Haven Woodbridge

Carl J. Amento, Executive Director

Comments on DEEP Scoping Document for Beverage Container Recycling Grant Program

The South Central Regional Council of Governments is a governmental entity representing fifteen municipalities—Bethany, Branford, East Haven, Guilford, Hamden, Madison, Meriden, Milford, New Haven, North Branford, North Haven, Orange, Wallingford, West Haven and Woodbridge—in the Greater New Haven area. As such, our goal is to serve the best interest of our member municipalities and their residents who will benefit in three ways from an effective beverage container redemption/recycling program: (1) financially, from reduced costs by beverage containers being redeemed rather than being placed in municipal recycling or waste collection systems, as well as redemption fees for residents; (2) environmentally, from reduction or elimination of litter, unhealthy conditions and blight caused by disposal of beverage containers in an uncontrolled manner and without proper incentives; and (3) behaviorally, from the residents of our municipalities gaining reliable and convenient access to beverage container redemption centers.

Further, applicants that can demonstrate public/private partnerships between municipalities and operators should be prioritized as bag drop applicants because they can provide residents with a quick and easy way to redeem their bottles, while at the same time reducing costs, taxes and waste to the municipalities. Municipalities have a vested interest in shifting materials into the deposit stream both from the waste stream as well as from the recycling stream (as recycling can be quite costly to municipalities). Municipal involvement can bring community involvement and synergies to the launch and continued operation of a successful, innovative programs. A cooperative approach across grantees should be allowed (and celebrated) if this approach yields efficiencies toward the achievement of the goals of this program. Regional partnerships could contribute as well through the coordination of consistent messaging.

Imagine a region-wide “hub and spoke” redemption system that is representative of a holistic recycling system as opposed to an individual recycling center. The material recovery facilities represent the hub(s) and the spokes are bag drop destinations that are placed in common stop locations such a grocery stores, transfer stations, municipal lots, and other convenient stops where it is easy for citizens to “drop and go”.

1. What types of information should DEEP request from applicants?

DEEP should expand the scope of who is an eligible applicant for a grant under the Beverage Container Recycling Grant Program to include municipalities which would have a holistic, community-driven perspective in providing a redemption service to its citizens, which could assemble a comprehensive network of container convenient, coordinated redemption centers, and collection, sorting and processing systems within a local geographic area through collaboration with private sector partners for community benefit. DEEP should request information on how an applicant would assemble, with community input, an equitable and comprehensive redemption system in a coordinated manner which would maximize the convenience and benefit to the economic and workforce development of residents and communities in urban centers and in EJ communities.

DEEP should also expand its criteria for an eligible applicant to include Councils of Governments which could encourage individual applications for grants by municipalities, as above, but in a coordinated, regional approach that creates economies of scale in collection, sorting and processing of redeemed beverage containers while ensuring equitable benefit to the residents of under-served neighborhoods and communities in a variety of ways: financially, environmentally and behaviorally.

2. What factors should DEEP evaluate when reviewing applications?

The DEEP should look for applications which provide for a comprehensive and coordinated approach to the whole system of beverage container redemption and which provide a sustainable, well-coordinated approach to the service of making beverage container recycling convenient and accessible with benefits focused on under-served neighborhood and communities and their residents. The system presented in the application should be scalable easily. The system should embody ease of use through technological innovation. The system proposed should be coordinated and service-oriented.

3. What siting criteria within urban centers and environmental justice communities should DEEP prioritize for optimal redemption center location – for example, should eligibility for funding through this program be limited to new redemption centers that are located more than a one-mile radius from existing redemption center? Should that radius be greater in municipalities with lower population densities?

Yes, however, while siting of redemption centers should be prioritized when proposed for urban centers and environmental justice communities, siting of redemption centers should not be limited to such locations. There are underserved areas located on the outer fringes of our metropolitan areas which should also be served so that all residents have reliable and convenient access to redeem their containers.

4. Should DEEP require performance reporting from grantees? What metrics should be included in such reporting?

Yes. With a technology-driven system with barcodes identifying distinct bagged container drop-offs, metrics such as number of individuals using redemption center, frequency of use, numbers of containers, and amounts of redemption could be collected as metadata while still protecting individual privacy. This would help measure the success of the location, and help drive decisions as to when to increase outreach and promotion.

5. Should DEEP include certain minimum processing capacity or technology/equipment requirements for eligible grantees? What should be the minimum processing capacity be for a grantee?

Yes, and while preference for operators should be given to locally-, minority- or women-owned operators, such owners should commit to using proven technology/equipment which emphasizes ease of use and convenience for the users. Other operators in underserved areas of the metropolitan area should still be given consideration where their proposal completes a regional network.

6. Should DEEP consider providing additional grant funding after the first year of operation based on performance metrics—for example, a standard “cents-per-container” calculation based on the number of containers redeemed by the grantee in the prior year of operation?

Yes, that should be considered.

7. What other grant program priorities should DEEP consider? What other questions should DEEP address in the final grant program application process?

DEEP should give special consideration to innovative and comprehensive solutions or pilots which could be implemented regionally in a coordinated fashion to better provide cost effective scalable access to all Connecticut residents.

Long lines will discourage or prohibit people from participating in a beverage container redemption program. i.e. long lines might mean being late for work – in which case the user may decide it's not worth waiting for a refund (and dispose of the containers in municipal trash or recycling collections instead of redeeming them. Or a user may not be able to access a center during operating hours, i.e. the only time they pass nearby may be at 6 am before work.

Unmanned 24-hour bagged beverage container drop systems would work well in urban settings by providing a quick 24-hour access point. Improving accessibility is not just about adding more locations but also providing a positive user experience so that the user will come again.

Research has shown that most consumers want to recycle containers, but they will recycle only if it is very convenient and there is incentive to do so. Not only do these factors result in superior recycling rates by consumers, it results in higher quality recycling. It is very convenient and there is incentive to do so.

This model is easily and inexpensively scaled. This is particularly important as demand increases due to the expansion of beverages covered under the law and the increase in the deposit rate from 5 to 10 cents. Currently, time and patience is necessary when returning bottles, e.g. RVM machines often require bottles to be deposited more than once before it is accepted, some bottles are not accepted at all in an RVM, RVMs become full requiring the resident to call someone to empty the machine, must wait in line for three machines - plastic, glass and metal, must go in a store and wait in line to turn in tickets for cash. These issues will increase dramatically as the bottle bill goes into effect.

A bag drop system allows for residents, in 15 seconds, to deposit their bag of bottles and containers into unmanned parking lot depots or bottle deposit stations that may be located in grocery store parking lots, liquor store parking lots, transfer stations, municipal lots etc. This is the ultimate level of access and convenience while addressing demand. This convenience and quick bottle bag deposit will be especially attractive to residents in low-income areas that are working one or two jobs to make ends meet and may have children to tend to.

For residents of any income level, the bag drop modality entices residents to return their bottles with ease thereby decreasing municipal costs/waste. The DEEP should develop a preference for a bagged bottle drop program overseen by municipalities on a regional basis with COG coordination. The result would be a complete system of public-private partners creating a coordinated, regional system. This will ensure community input, better service as residents become on-going stakeholders through their local governments, and a consistent, sustainable system which would have the greatest chance for effectiveness and scalability.

Thank you for your attention to these comments.

Sincerely,

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