

January 22, 2019

Via Electronic Mail

Re: Recycling Responsibilities of Haulers and their Customers

Dear Connecticut Haulers (i.e., "Collectors"):

I am writing to follow up on discussions that took place between commercial haulers, the National Waste & Recycling Association (NWRA) and Connecticut Department of Energy and Environmental Protection (DEEP) staff in the fall of 2016 and early 2017. Based on those discussions, DEEP has updated the following materials (attached) to summarize haulers' obligations under existing Connecticut recycling laws and the Comprehensive Materials Management Strategy (CMMS) and to support your communication of recycling requirements to your customers.

- Summary of Recycling Requirements and Best Management Practices (BMPs) for Haulers
- Letter to Connecticut Businesses and accompanying Recycling Requirements for Businesses.
Please share this letter with your commercial customers.

As you are aware, haulers and their customers have a shared responsibility to comply with Connecticut's recycling laws. To promote compliance, DEEP has been providing resources for businesses to work with haulers, custodial service companies, building and property managers, and resource management companies to improve their recycling programs. When reviewing and negotiating new contracts or revisions, DEEP has advised that businesses ensure that the resulting contract(s) meet(s) their waste and recycling needs. You may receive inquiries from your customers about providing waste and/or recycling services and must ensure that any waste management agreement or contract with a business or resident complies with Connecticut's recycling requirements.

Despite previous specific conversations with haulers and NWRA regarding the contracting requirements of [CGS 22a-241j](#), DEEP through its ongoing Recycling Enforcement Initiative (REI) is still finding instances of noncompliant contracts. Specifically, DEEP has noted numerous multi-tenant housing complexes and other commercial customers which only have a contract for trash removal in place. After notifying the property owners and/or managers that this does not comply with state law, DEEP is then provided with copies of new contracts for recycling services that are dated after the date the non-compliant contract was documented. As was made clear in the 2016/2017 meetings, DEEP's expectation is that haulers will be proactive rather than reactive in order to comply with the law and meet their statutory obligations.

In addition to just simply providing a minimum number of recycling bins and/or containers at a customer's location, we expect haulers that should play a larger role in helping their customers implement sufficient and convenient recycling programs to provide for and cause the separation of designated (i.e., mandatory) recyclable items from other solid waste generated at that location. This would include considerations regarding:

- Number, size and location(s) of recycling bins provided such that containers adequately provide for and cause the collection of designated recyclable items separate from other solid waste
- Clear labeling and color-coding of provided bins
- Educational materials for the occupants (e.g., tenants, employees, occupants) of that location.

With regards to providing recycling guidance to any residential customers to which your company provides services, DEEP recommends utilizing the **What's IN, What's OUT** materials on the www.RecycleCT.com website. The templates found here can be downloaded and customized to include a company logo and/or company information.

For additional information, including [Business Recycling Assistance](#), please refer to www.ct.gov/deep/recycle, which provides details on recycling requirements and how to set up a recycling program.

You may also visit www.ct.gov/deep/SolidWasteHaulerResources for information on hauler reporting requirements and other hauler specific resources.

For additional assistance on these issues, please contact your town's municipal recycling coordinator or Chris Nelson of my staff at chris.nelson@ct.gov or 860-424-3454.

Sincerely,



Robert C. Isner, Director
Waste Engineering & Enforcement Division

Electronic copy: Municipal Recycling Coordinators