CONNECTICUT LEAGUE OF CONSERVATION VOTERS

TESTIMONY
HB 6486 Extended Producer Responsibility for Tires (EPR)

January 30, 2023

To: Honored Co-Chairs Sen. Lopes and Rep. Gresko, Vice Chairs Sen. Hochadel and Rep. Palm, Ranking Members Sen. Harding and Rep. Callahan, Distinguished Members of the Environment Committee

From: Lori Brown, Executive Director, Connecticut League of Conservation Voters

On behalf of CTLCV, thank you for the opportunity to express our concerns and recommendations for HB 6486. While CTLCV supports Extended Producer Responsibility to increase tire recycling and reduce illegal tire dumping, the bill as written will not achieve an effective and sustainable solution to the problem.

Efforts to pass legislation addressing the disposal of used tires have been presented to the Environment Committee multiple times. The original intent has always been to ensure that industry is fully engaged and responsible for designing and abiding by an agreed upon EPR program that considers products from cradle to grave. To this end, HB 6486 is not an EPR proposal.

CTLCV understands the difficulty in designing this program, and recognizes that the industry has not yet been required to consider alternative solutions that would be more effective. However, there are examples from other countries and different strategies to consider for the least environmentally damaging use of scrap tires.

In place of HB 6486, we recommend looking to the language of HB 5139 proposed last year as your starting point.

A few specific areas to consider:

*Establishing measurable recycling targets to achieve waste reduction goals
*Creating an independent, non-profit stewardship organization to oversee the program
*Burning scrap tires for energy should not be considered "recycling"
*Prohibiting discarded tire rubber from being used in playgrounds and sports fields

Thank you for your consideration and your commitment to our environment!

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