



TESTIMONY

**SB 115 AAC EXTENDED PRODUCER RESPONSIBILITY  
FOR CONSUMER PACKAGING**

February 23, 2022

**To:** Honored Co-Chairs Sen. Cohen and Rep. Gresko, Vice Chairs Sen. Slap and Rep. Palm, Ranking Members Sen. Miner and Rep. Harding, 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 submit testimony on SB 115 **IN SUPPORT WITH REVISIONS**. CTLCV has continually supported efforts to update our waste management systems, but this bill needs critical changes to remove loopholes for chemical recycling.

In the U.S., **40% of household waste is packaging and paper products**. Many of these products are not recyclable because it is cheaper for corporations to make single-use products and packaging. Extended Producer Responsibility (EPR) programs use a fee structure to hold manufacturers accountable for the materials used in their packaging. **By putting the responsibility back on the manufacturers, EPR incentivizes them to redesign their packaging to be more sustainable and truly recyclable.** Manufacturers take responsibility for their product and packaging through all life cycle stages and would be part of a stewardship organization that develops and oversees the program.

EPR programs already exist in our state for electronics, paint, mattresses, and mercury thermostats. Legislation in 2021 would have created new EPR programs for tires (dumped illegally all over Connecticut), smoke detectors (slightly radioactive) and gas cylinders (which can explode when processed at material recovery facilities). In addition to packaging waste, CTLCV strongly supports the renewed effort to address tires and gas cylinders again in 2022.

EPR for packaging is a critical piece of the [2020 CCSMM recommendations](#). DEEP estimates that packaging EPR alone could reduce municipal solid waste by as much as **190,000 tons per year**, saving municipalities up to **\$40 million** annually. EPR strategies can create much-needed cost savings for municipalities while improving the quality of our entire recycling stream.

CTLCV shares concerns that have been raised about the loopholes for chemical recycling within the definition of recycling in this bill. Chemical recycling, or 'advanced recycling', uses many steps with high heat and chemical processing to turn plastic into fuel to be burned. The production and burning of this fuel releases harmful toxics, such as benzene, lead and barium, into the air. These are associated with health concerns ranging from cancer to developmental toxicity to damage to multiple organs and puts communities around these facilities at risk. The current definition within this bill permits any process that involves plastic-to-fuel as long as some of that fuel is turned back into raw material. **An effective EPR program must ban any plastic-to-fuel process if any portion of that fuel is combusted.**

We ask that you remove the second and third sentences in Section 1(12) (the definition of "Recycling") and replace them with the following:

"Recycling" does not include landfill disposal, incineration, combustion, pyrolysis, gasification, or any thermal treatment process that produces gaseous, liquid, or solid product **of which any portion** is combusted or incinerated as a part of the thermal treatment process or at any point thereafter."

Our neighbors in Rhode Island and Massachusetts have opposed similar efforts to allow chemical recycling. We urge the Committee to address the definition of recycling and advance the environmentally responsible provisions contained in the bill. Thank you for your thoughtful consideration in crafting the most sustainable EPR program possible.

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