



The power of packaging in balance.™

AMERIPEN
American Institute for Packaging and the Environment

Testimony
General Comments
Connecticut House Bill 6917
An Act Concerning the Management of Solid Waste in the State

Joint Committee on Environment
February 19, 2025

Chairs Lopez and Parker, Vice Chairs Hochadel and Bumgardner, and Members of the Joint Committee on Environment.

AMERIPEN – the American Institute for Packaging and the Environment – appreciates the opportunity to submit written testimony on House Bill 6917 (Bumgardner) that calls, in Section 5, for the Department of Energy and Environmental Protection (DEEP) to evaluate and report on Connecticut's potential for an Extended Producer Responsibility (EPR) program for packaging. While AMERIPEN does not oppose this requirement, we would recommend amendments to include broader stakeholder collaboration and consultation on its recommendations.

AMERIPEN is a trade association dedicated to improving packaging and the environment. We are the only material-inclusive packaging industry trade association in the United States representing the entire packaging supply chain. This includes materials suppliers, packaging manufacturers, consumer packaged goods companies, and end-of-life materials managers. Our membership also includes a robust array of industry, material, and product-specific trade associations who are essential to the AMERIPEN fabric. We focus on science and data to support our public policy positions, and our advocacy and policy engagement is based on rigorous research rooted in our commitment to achieve sustainable packaging policies. We have several member companies with an established presence in Connecticut, and many more who import packaging materials and products into the state. The packaging industry supports nearly 13,000 jobs and accounts for more than \$4 billion in total economic output in Connecticut.

AMERIPEN acknowledges that EPR programs can be a useful policy mechanism to help achieve environmental goals and reduce waste by bolstering recycling programs. The packaging industry understands the value of properly designed EPR programs and their potential to improve the recycling system. AMERIPEN would note that EPR for packaging has already been studied in Connecticut, under the Task Force to Study Methods for Reducing Consumer Packaging that Generates Solid Waste, which was a result of Senate Bill 233 of 2016, and resulted in a [Report](#) to the General Assembly in 2018. This report did not recommend EPR, but AMERIPEN is aware that there continues to be developments in this area of policy.

Despite this previous work, the report required in Section 5 of HB 6917 would be a significant undertaking and has the potential for dramatic impacts on the State's solid waste system, if all of the report elements became the basis for future legislative programs. As such AMERIPEN requests amendments to Section 5 to provide for the following considerations:

- Prior to finalizing the entire report required under Section 5, DEEP must have a requirement to perform outreach and solicit input from the public and various stakeholders like AMERIPEN, solid waste management companies, retailers, and others.
- Consult with producers of packaging prior to suggesting any trends as required in Section 5(3).
- Consider both cost savings to residents of the State and municipalities – and the potential for cost impacts on producers under Section 5(4).

- Consider the supply and demand aspects of post-consumer packaging markets and impacts that post-consumer recycled content mandates may have on producers.
- Consult with industry stakeholders on packaging reduction and collection efforts under Section 5(6).
- Consider the design of the EPR program in Minnesota and other states; in addition to neighboring states under Section 5(7).

AMERIPEN applauds the action being taken by the State of Connecticut in the past and currently under HB 6917 to consider improvements to solid waste programs and recycling. If Section 5 of HB 6917 continues move forward in the legislative process, AMERIPEN urges the Committee to consider the suggestions listed above, to improve the outcomes of the report required and expand the buy-in on any suggestions that might come from such a study.

We hope that our suggestions in this testimony provide useful guidance and believe that broader consultation is necessary to make an EPR report successful under HB 6917. We look forward to continuing discussion with the Committee on this important topic and the consideration of potential amendments to HB 6917. Please feel free to contact Andrew Hackman, with Serlin Haley LLP at ahackman@serlinhaley.com with any questions regarding AMERIPEN's position on this important issue.