

**Environmental Committee**  
**January 30, 2023 Public Hearing**  
**An Act Concerning Extended Producer Responsibility for Tires (R.B. 6486)**

Dear Honored Co-Chairs, Sen. Lopes, and Rep. Gresko, and distinguished Environmental Committee Members:

Thank you for the opportunity to submit testimony in opposition of Raised Bill No. 6486, An Act Concerning Extended Producer Responsibility for Tires.

The Capitol Region Council of Governments (CRCOG) serves 38 municipalities and approximately one (1) million residents within the Greater Hartford region.

While CRCOG opposes the proposed language in R.B. 6486 as drafted, we support responsible and sustainable Extended Producer Responsibility for Tires. The proposed language does not establish an adequate and accountable scrap tire stewardship program to reduce the disposal burden and costs on municipalities nor does it adequately address health and environmental concerns.

As we know, the State of Connecticut is in the midst of a waste crisis. The cessation of operations at the Materials Innovations & Recycling Authority (MIRA) in Hartford, capacity and infrastructure limitations at CT's remaining waste-to-energy facilities, dependence on out-of-state landfills, and the rise in transportation and hauling costs, have combined to create an increase in illegal dumping and costly environmental and economic burdens on our municipalities.

In addition to costly environmental impacts on our region and beyond, illegally dumped tires cost our municipalities hundreds of thousands of dollars annually for clean-up and disposal. In Hartford alone, illegally dumped tires cost the City up to \$80,000/annually for cleanup and disposal. EPR programs have proven successful in ensuring that certain products, like batteries, electronics, mattresses, and paint, are properly disposed of at end of life and beneficial to taxpayers and municipalities.

EPR, including EPR for tires, must be a part of a comprehensive stewardship plan for manufacturers to share the burden, costs, and responsibility of proper waste disposal, while ensuring adequate, sustainable funding for public education and outreach, and responsible end-of-life tire management to reduce the substantial economic and environmental burden of clean-up and disposal on municipalities.

Effective, responsible, and sustainable EPR can save municipalities and taxpayers millions of dollars and address the growing solid waste crisis facing our municipalities, region, and State.

CRCOG urges the Committee to ***reject the bill as drafted*** and, instead, **adopt legislation establishing an effective, sustainable, and accountable manufacturer-funded EPR program consistent with the proposal considered in 2022, HB-5139.**

Thank you again for the opportunity to comment on this bill. I can be reached at [mhart@crcog.org](mailto:mhart@crcog.org) with any questions.

Sincerely,



Matthew W. Hart  
Executive Director, Capital Region Council of Governments