

November 3, 2023

Melanie Loyzim, Commissioner
Maine Department of Environmental Protection
Maine Department of Environmental Protection
17 State House Station
Augusta, Maine 04333-0017

Re: Comment on Extended Producer Responsibility Program Concept Rules

Dear Commissioner Loyzim,

On behalf of ReSource Waste Services (Lewiston), we wanted to submit brief comments on the Concept Draft Rules regarding the Extended Producer Responsibility Program. After review of Part 1, dated September 1, 2023, we identified a number of inconsistencies between definitions contained in the draft concept rules and definitions currently in statute.

As a company that relies on consistent interpretation of these definitions to maximize beneficial reuse and recycling of Maine waste that comes into our facility, we would encourage the Department to undertake a review of these provisions to ensure that definitions in these draft concept rules are consistent with those in statute.

We would be pleased to discuss further if helpful. Thank you for your consideration.

Sincerely,


Gregory Leahey
Chief Strategy Officer
ReSource Waste Services