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December 20, 2022

Commissioner Loyzim,

Thank you for the opportunity to provide comments on the implementation of Maine's Extended Producer Responsibility law. At Allagash, we believe we have a responsibility to care for the wellbeing of our employees, our community, and our environment. For this reason, we are committed to the success of the EPR program.

This program, as it is proposed, is designed to affect the largest companies that create the most amount of waste in our state. We support the current exemptions in place- including Maine's bottle bill- but caution against including additional exemptions for producers. Additional exemptions would create inequality in the program favoring larger producers with more funds to lobby for their interests, and negatively impact our communities, leaving the burden of paying for the management of these materials to participating producers or the municipal taxpayers.

We understand that some producers must abide by regulated packaging laws, which could make alternative, more recyclable packaging options challenging. While that may be the case, Allagash believes that these producers should not be allowed blanket exemptions and should be held responsible for the waste they are producing by paying fees into this program.

Allagash does believe that creative efforts by producers to keep materials out of landfills -such as Allagash's recycling co-op which offers local businesses a free option to properly manage hard to recycle materials; such as #4 low-density polypropylene, #5 woven polypropylene bags, PakTech carriers, etc. - should be considered as a "credit" and can be used to offset some program fees.

Thank you for the opportunity to provide comment on this historical law. We look forward to working with Maine DEP in supporting this program.

Respectfully submitted,

Zoe Malia

Environmental Sustainability Coordinator

Allagash Brewing Company