



Town of Brunswick, Maine

INCORPORATED 1739

ECONOMIC & COMMUNITY DEVELOPMENT

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December 8, 2022

Melanie Loyzim, Commissioner - MDEP
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Commissioner Loyzim:

The Town of Brunswick supports the Extended Producer Responsibility (EPR) for Packaging program established in MRS Title 38 § 2146. Thank you for the opportunity to participate in rulemaking regarding producer exemptions for this important law.

We believe that the packaging material that ends up in residential recycling bins should be kept in the EPR system to the greatest extent possible, unless that material is being managed under a different product stewardship program, and that we should be reimbursed for the responsible management of producer packaging materials to the greatest extent possible.

As a municipality, we cannot control the amount and type of packaging that is sold or offered in our community—only the producers can. This makes it very difficult for us to take control of costs, especially when the market for recyclables is down. The EPR law puts the cost of recycling on the producers who make and have control over their packaging, and that helps us get away from paying for something that is beyond our control. This basic principle is why we don't support exemptions. Packages that have special circumstances should be managed through carefully planned fee structures.

Putting the cost of exempt materials onto obligated producers is unfair and weakens the EPR law, which in turn could negatively affect municipal reimbursements for the services we provide.

The exemptions already in the EPR law are fair and consistent with other EPR laws around the world. Any packaging material that is federally regulated should be managed with fees, not exemptions, because that packaging is managed by municipal recycling system regardless.

Thank you for considering the impact exemptions would have on the efficacy of the EPR program and the cost of exemptions to municipalities like Brunswick.

Sincerely,

James Mason, Chair
Brunswick Town Council

John Eldridge
Brunswick Town Manager

Chrissy Adamowicz
Economic Development
Project Manager