



ESTABLISHED 1975

December 7, 2022

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

Re: Producer Exemptions

Dear Sir or Madam:

Please accept the following comments concerning the Department of Environmental Protections stakeholder meetings addressing rulemaking topics for the Stewardship Program for Packaging Law, 38 M.R.S. § 2146.

For decades, Casella has invested in the Northeast's recycling infrastructure, including single stream collection, processing, and sorting systems, which serve thousands of municipalities and businesses and recover hundreds of thousands of tons per year of recyclable materials.

We believe that the best way to improve recycling outcomes in Maine is through continued investment in existing infrastructure, better public outreach and education, and the strengthening of markets for recycled commodities. To the extent that EPR for Packaging might help drive these improvements, we are generally supportive.

On the topic of exemptions for specific types of packaging, as described in the background information prepared by the Department, we offer the following observations:

- Some, but not all, of these materials are on the acceptable list for our recycling facilities today.
- Many of these materials can be observed in the recycling mix that we receive at our facilities today. Some leave as saleable commodities headed to markets and mills. Others leave as residue.
- Specific quantitative data on the amount of these materials in the stream is not available today and would require detailed manual material audits to determine.

Thank you for the opportunity to provide comment. Please reach out if we can provide you with additional information, or if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Bob Cappadona". The signature is fluid and cursive.

Bob Cappadona

Vice President

Casella Resource Solutions