



Town of Harpswell

P.O. Box 39

Harpswell, ME 04079

March 30, 2023

Maine DEP

RE: EPR program and municipalities:

Dear Maine DEP:

Harpswell, the first town in Maine to begin (in 1979) a mandatory municipal recycling program, encourages the Maine Department of Environmental Protection (DEP) in its efforts to implement the Extended Producer Responsibility (EPR) law (Title 38, §2146. Stewardship program for packaging). **Harpswell further encourages Maine DEP to keep the process as simple as possible for towns in the state to participate in EPR.** Detailed processes or reporting in the EPR Program for municipalities would make it difficult to participate. We suggest that metrics be data that is readily obtainable from that normally maintained by haulers.

On the Maine DEP's EPR webpage, "Background Information for Municipality Reimbursement" some questions are asked of municipalities. Some of the questions ask about relationships with haulers, and we would like to inform DEP's EPR efforts that, for the Town of Harpswell, our recycling information consists of reports of tonnage provided to the town by the hauler. While we have, in general, excellent quality of recycled materials due to the dedication of town employees whose daily oversight of our recycling operation prevents much contamination, we do not get reports on the quality of, nor of the quantities of the various materials in, our recycling.

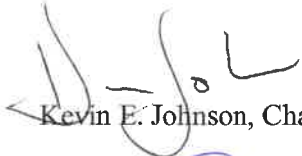
Despite the quality of our recycling, a major problem for our town is that the cost of recycling has been increasing – the latest cost (175\$/ton) exceeded, not for the first time, the cost for disposal of trash. (Harpswell also does not get any real-time data - the reports from the recycling facility are delayed by at least two months, on average.) We note that, while we have improved our percent recycling, there is a disincentive as long as it is costing us more to do so.

We also point out an important issue that may affect other communities - Harpswell experiences a significant increase in population in the warm weather months, and this increase in population is reflected in our monthly recycling center tonnage figures. Based on this, we recommend that as you continue to identify municipal group similarities, you should focus more on the tonnage, rather than population, similarities. We also suggest that municipal reporting be submitted on an annual basis, at the end of the March of the following year. Again, we encourage the municipal reporting to be as simple as practical.

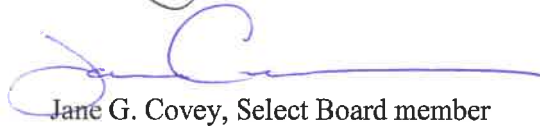
We urge the DEP to consider including strong incentives for towns to participate in the EPR program, and to keep in mind that smaller municipalities already face a number of burdens in running recycling programs. Participation will likely be predicated on whether the DEP is able to keep the costs - time and effort to opt in – at a minimum for municipalities.

Thank you for your efforts.

Sincerely,
Harpswell Select Board



Kevin E. Johnson, Chair



Jane G. Covey, Select Board member



David I. Chipman, Select Board member



Charles Perow, Manager, Harpswell Recycling Center/Transfer Station

Philip Conner, Chair, Harpswell Recycling Committee



cc: State Senator Mattie Daughtry
State Representative Cheryl Golek