

January 20, 2023

Dear Commissioner Loyzim:

One of the more valuable resources that will come out of EPR is the data. I think EPR can help Maine build one of the most efficient and effective recycling systems in the world. But we won't be able to make good decisions about infrastructure and education unless we have rich data to guide us.

I would ask the Department to make rules that incentivize a Collector (municipality or quasi-municipality) to report more data at faster cycles. Set minimums for data requirements and reporting cycles for participation in the program, but allow for progress towards these goals of the max amount of fine grained data as close to real time as possible. Initially, the annual cycle may be the best we can do. But as we are able to invest in recycling infrastructure and the systems that support it, we will build towards these incentives. If we fail to provide proper incentives towards innovation and efficiency, we run the risk of building the future systems like the past, and maintaining status quo.

How would we incentivize more data at faster cycles? Perhaps reimbursement rates are boosted for more frequent reporting cycles, and also boosted for providing finer grained data than the minimums required.

It is hard for us to stand in the present and see accurately into the future, what technologies, processes, and infrastructure will be in place for leverage. Luckily, we don't have to have a clear picture of what the future will be like, to get distracted by a "how" we cannot understand in the present. We only need to ensure our incentives are aligned with the direction we know we should go. Leave it to the innovators of the future to figure out how to get us there.

Earnestly,

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