

Nadeau, Jessica

From: Jay Reynolds <jay.reynolds@capeelizabeth.org>
Sent: Wednesday, January 18, 2023 1:36 PM
To: Maine Packaging EPR
Subject: EPR for Packaging - Stakeholder Comments

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Good Afternoon,

Thank you for the opportunity to speak and comment on the upcoming development of legislation pertaining to the above-stated. To summarize my comments, and support other comments made at the stakeholder meeting on January 10th, I offer the following written comments:

- It is recommended that the rulemaking group strive toward making the program as a whole, and the reporting requirements, as streamlined and efficient as possible. Some suggestions to achieve this are:
 - As mentioned in the meeting, Ecomaine is a regional waste-to-energy facility, who manages MSW and Single-stream recycling for more that 450,000 Mainers in 73 communities. Ecomaine tracks incoming and outgoing tonnages for all communities on a monthly, calendar year, and fiscal-year cycles. There may be an opportunity, if the framework for reporting and reimbursement is centered around MSW and single-sort recycling, to utilize this WTE facility (and other WTE facilities in Maine) and consider utilizing their reporting structure/techniques to assist in streamlining the process.
 - Another municipality spoke at the stakeholder meeting, and I echo their comments, which were as follows: Municipalities that operate transfer stations already have to report to the State all of their materials that are transferred through our facilities. We provide all the materials data on two separate reports to the State's bureau of Solid Waste and State Planning Office. Many Public Works officials like myself have advocated in the past for one reporting mechanism, as the information provided by the municipality is identical, but the reporting forms (provided by the State) are different. The recommendation here is to NOT create a third layer of Solid Waste reporting, but merge the three into one.
- I also commented that the rulemaking group considered looking to other countries who have already implemented EPR Packaging programs. Although one of the panelists dismissed my comment at the 1-20-23 meeting, I will clarify my comment and add to it: The comment I made was not to suggest that Maine implement the same program as another country, such as Canada or any european nation, but to look at their program to see if the rulemaking group can save time and effort by reviewing some of the program and/or regulatory framework that they have. This may be of value, regardless if our waste stream/cycle is different from these other countries.
- I will also echo and support another public comment that suggested the timeline for implementation be accelerated, and as suggested, implementation moved from 2027 to potentially 2025.

Thanks again for the opportunity to provide comments on this subject.

Signed,

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