



Town of Harpswell

P.O. Box 39

Harpswell, ME 04079

October 20, 2023

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

Delivered via Email to MainePackagingEPR@maine.gov

Subject: EPR draft rules

Dear Maine Department of Environmental Protection,

The Harpswell Recycling Committee and Solid Waste Manager have been participating in the Extended Producer Responsibility (EPR) development process since its inception, to include in person hearings, online meetings and an onsite visit, tour and discussion at the Harpswell facility.

We would like to reiterate with support from our Select Board, that we feel strongly the reimbursement portion of the EPR program should be based on a municipality's tonnage not population. A large portion of Maine's economy is based on tourism. Many parts of our state have seasonal visitors and secondary vacation home/camp owners that effect and fluctuate a town's population and overall waste stream. By using already available information provided in annual DEP reporting, which all municipalities are required to file annually, administrators of the EPR program would have fresh data on a yearly basis to base reimbursement on. They would also have access to the each town's historical waste and recycling data. This could be used to develop and project trends for future planning purposes, and to simplify the process and collection of data as a whole. Administrators would not be basing reimbursement on census data that can be up to ten years old during its useful cycle. If the last few years have proved anything it's that populations can change quickly under the right circumstances.

Thank you for taking these points into consideration.

Respectfully,

Charles Perow

Harpswell Solid Waste Manager

A handwritten signature in black ink, appearing to read "Charles Perow", is written over a horizontal line.