



August 22, 2024

Brian Beneski  
Bureau of Remediation and Waste Management Director  
Maine Department of Environmental Protection  
17 State House Station  
Augusta, ME 04333

RE: Extended Producer Responsibility (EPR) Draft Rules

Dear EPR Team of Maine Department of Environmental Protection:

I am writing on behalf of the Municipal Review Committee (MRC) to provide feedback and express our support for the proposed rule for Chapter 428, Extended Producer Responsibility (EPR), put forth by the Maine Department of Environmental Protection (DEP).

While we acknowledge that EPR is a complex initiative, the MRC and its members recognize the significant potential for our members and the Hampden processing facility, operated by Municipal Waste Solutions (MWS), to serve as invaluable assets to the EPR program and our member communities.

While the MRC recognizes that anaerobic digestion complies with EPR rules, it deserves explicit recognition in the rules rather than being subsumed within a complex system process definition. Our search for the word "anaerobic digestion" within the rules yielded no results, highlighting the need for clearer acknowledgment of this process.

We believe that larger facilities like MWS, in which MRC holds a stake, should be leveraged to maximize the benefits of the EPR program. These facilities have the capacity, technology, and expertise to handle substantial volumes of recyclable materials efficiently and effectively. By utilizing such facilities, the program can achieve economies of scale and improve overall recycling rates across the state.

Furthermore, we propose that the Stewardship Organization (SO) work directly with MRC rather than individual municipalities in our region. This approach would streamline the program's administration, reducing bureaucratic complexities and potential inconsistencies in implementation. MRC, as an established entity representing multiple municipalities, is well-positioned to coordinate efforts, aggregate data, and serve as a central point of contact for the SO.

This streamlined approach offers several advantages:

1. Simplified reporting and data collection processes
2. Consistent implementation of EPR guidelines across member municipalities
3. More efficient allocation of resources and funds
4. Enhanced ability to adapt to program changes and improvements

We believe that by leveraging MRC's existing infrastructure and relationships, the EPR program can achieve its goals more effectively while minimizing administrative burdens on individual municipalities.

The MRC is committed to supporting the success of the EPR program and is eager to collaborate with the DEP and the future Stewardship Organization to ensure its smooth implementation in our region. We stand ready to provide any additional information or assistance that may be helpful in refining the proposed rule.

Thank you for your consideration of our feedback. We look forward to working together to create a more sustainable future for Maine through this innovative EPR program

Sincerely,

A handwritten signature in cursive script that reads "Michael Carroll". The signature is written in black ink and is positioned above the printed name.

Michael Carroll  
Executive Director Municipal Review Committee