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Sent: Tuesday, October 31, 2023 12:26 PM
To: Maine Packaging EPR
Subject: Comment on EPR drafts

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To MainePackagingEPR:

EPR_Conceptual Draft Rules Parts 1, 2 and 3 set out a complex framework. I would like to express concern over two concepts in the proposals: calculations for reimbursement and audits.

Reimbursement: Paragraph 3 Defining municipal reimbursement; B. ... “A municipality’s per capita share is determined by dividing the statewide total tons of packaging material that are not readily recyclable (as reported sent into Maine by producers) by the state’s population and **then multiplying by the municipal population.**”

This concept does not take into account seasonal cost increases from non-residents’ disposing of solid waste - for those towns who have a large increase in non-residents during tourist seasons. In Harpswell, the seasonal population can double the traffic at the recycling facility during the summer months.

For towns that have been reporting tonnage to the state under current rules, perhaps the EPR rules could allow an alternative – such as using actual tonnage managed?

Audits: For those participating, audits may become an issue if they are burdensome. At this point, it isn’t clear what the audit process may entail, but the regulations should be clear that it must not become a burden that would dissuade towns from participating.

Thank you for your hard work and for consideration of these issues.

Gina Snyder

Harpswell Maine.