

## Bertocci, Elena

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**From:** Bertocci, Elena  
**Sent:** Wednesday, November 1, 2023 10:05 AM  
**To:** Maine Packaging EPR  
**Subject:** FW: producer reporting  
**Attachments:** Conceptual Draft Rule\_Exemptions, Definitions, RR and Producer Fees\_Sept 2023  
Lorax.docx

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**From:** Michelle Carvell <mcarvell@loraxcompliance.com>  
**Sent:** Tuesday, October 31, 2023 5:46 PM  
**To:** Bertocci, Elena <Elena.Bertocci@maine.gov>  
**Cc:** Gabriela Dobrot <gdobrot@loraxcompliance.com>  
**Subject:** RE: producer reporting

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Hello Elena,

We wanted to combine the comments for these items below with the comments we've had back from our clients on the full Concept Draft rules. Are you able to pass on to the email address collecting comments, or shall I send there directly?

I think in general, the items you're asking for below are not too dissimilar to requests we see in a couple of the EU markets, but the key difficulties we see lie in the definitions of "component", "package", "material", especially when referred back to the Concept Draft where we have made a number of comments about the descriptions used.

I would only have 2 further comments:

1. The only criteria I haven't seen before is the requirement to specify toxins. Whilst these are banned within packaging in the EU, certification is not required.
2. In point 6 you ask for the weight of the heaviest packaging type. I saw in the rules, you only require a 60% threshold for a material, so in theory, could you have a component weighing 100g, but only require a producer to report 60g? Considering any payments you make would be weight based, could this type of reporting mean that some materials are missed?

Happy to chat through if any of our comments don't make sense (please ignore the yellow highlights, these were just our internal notes).

Kind regards,  
Michelle

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**Michelle Carvell**, Director & COO

[Lorax EPI](#)

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**Looking forward to attending the following events:**

**Sustainable Packaging Summit 14-15<sup>th</sup> November in Amsterdam, NL**

**SPC Engage 6-7<sup>th</sup> December in London, UK**