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From: Cormier, Beth <Beth.Cormier@sappi.com>
Sent: Monday, March 13, 2023 3:58 PM
To: Maine Packaging EPR
Subject: Registration for the March 14th session

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I registered for the March 14th session but the calendar invite was for March 28th session. I would like to submit written comments for the March 14th meeting based on the background document provided... These are below.

From the background document

Section I subsection D. Question: *“are there additional details surrounding readily recyclable that should be defined in the rule?”*

Comment: Support readily recyclable being defined at the material level (by material type) with criteria which is assumed to put to use industry (material-specific) technical standards. However the level to which a material is actually recycled is equally important to help determine where funding is needed to improve the ecosystem and therefore drive the appropriate producer fee, municipal reimbursement, and ecosystem investment payment structures.

Section II setting of program goals question; “what should a goal be for increased post -consumer content in packaging material be?”

Comment: Overall support for recycling in general. Important to recognize the current “best use of recycled fiber” principles. For high quality paper packaging and food contact paper packaging there are performance needs in the market that may limit the level of post-consumer fiber that can be utilized. High levels of post-consumer fiber in paper based packaging drives the following outcomes: higher carbon footprint of product in those cases where fresh fiber has a lower carbon footprint than recycled, lower yield on the paper making process due to narrowing runnability window due to the negative impacts of contamination, lower strength characteristics of the final product and impacts to the ability to use in food contact applications. Very clean, high quality fiber is needed for food contact applications.

Furthermore any of these goals should be material specific based on the consumer performance needs.

Kind Regards,
Beth A. Cormier

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