



**Public Comments on Behalf of ecomaine Regarding Extended Producer Responsibility  
Definition of *Readily Recyclable*; Auditing; and Goals**

**Matt Grondin, Director of Communications & Public Affairs**

**Department of Environmental Protection Stakeholder Meeting, April 11, 2023**

Thank you to the Department of Environmental Protection for the chance to engage with these stakeholder meetings on Maine's emerging EPR law. The Department is to be commended for this process of engagement, which provides transparency and buy-in from such a vast group of participants. My name is Matt Grondin; I am the Director of Communications & Public Affairs at ecomaine and I am pleased to provide feedback for this round of stakeholder meetings on the definition of *readily recyclable*; program audits; and goals for the EPR program.

**"READILY RECYCLABLE"**

In terms of the process of defining what is *readily recyclable* in the State of Maine, we would encourage additional and ongoing stakeholder meetings to periodically refine, update, and discuss packaging material that exists and that has been newly introduced to the market. These meetings should occur at least annually, and perhaps as frequently as every six months. We do not wish to overburden DEP staff or members of the stakeholder group; however, we feel that a core group of materials are, and will continue to be, readily recyclable for the majority of Mainers, and such a meeting can confirm those briefly before moving on to emerging questions from producers, recycling facilities, and municipalities. The ability to incorporate flexibility in what might be a rapidly changing environment will be important, particularly as MRFs like ecomaine's transition to a third-generation facility in the next several years.

As to the "who" of the stakeholder group, we would suggest a group that, at a minimum, includes each of the processing facilities that handle a significant portion of Maine's recycling stream: ecomaine, of course, and Casella, Waste Management, the MRRA, Aroostook Waste Solutions, the Municipal Review Committee, Unity Area Regional Recycling Center, and others. It may also be helpful to have representatives from packaging manufacturers in attendance, to have a real-time dialogue about certain packaging materials. And we feel that it would be beneficial to have participation from municipalities who are engaged in the EPR program. Lastly, of course, the stewardship organization and the Department will have a critical role in convening, facilitating, and participating in these meetings.

The processing facilities will have the expertise to inform participants as to their lists of materials that are (and are not) acceptable for recycling – ecomaine's lists are included below. This is, by no means, an all-inclusive list, and so an initial meeting will be critical to setting the baseline across all facilities at the outset. From this point, manufacturers should be allowed a reasonable amount of time to react and adjust to that baseline. Since there is much overlap in a majority of single-sort recycling facilities' acceptable materials, the core group of materials should be fairly easy to determine as *readily recyclable*.



## GOALS

We do not have a long list of items for input, as to the program's goals, however, ecomaine would encourage the development of rules and goals that allow for flexibility, as materials come online that may be more lightweight in the future, for example – this would create inconsistencies in measure total tons of a material.

We acknowledge that this creates a lack of clarity in goal setting, as we hope to recycle more, but use less material overall. This conflict makes clear communication in the *readily recyclable* stakeholder meetings even more important.

Access to programs that allow for participation in recycling will be an important measure; we would suggest that a parallel measurement system of the whole of Maine alongside measurement of participating municipalities would provide the most clarity for the EPR program.

## AUDITING

Auditing will prove to be at the crux of a successful data-gathering program in EPR. In determining what material in the stream is *readily recyclable*, it would stand to reason that an audit would be best conducted by a "scoop audit" from a MRF's tipping hall floor, *before* the sorting process has begun, *before* materials are sorted into a discrete bunker, and *before* they are baled for market. This will allow for easiest access to the material and will provide the most accurate look at incoming material from Maine's residents.

It is our opinion that ecomaine could allow for the space to conduct some such audits for the communities served by our recycling program. However, we would suggest that it would be a challenge for our existing staff to both run the MRF *and* conduct audits. It could be a possibility, through increasing staff capacity via support from the Department, stewardship organization, or elsewhere, that ecomaine could be trained on EPR program auditing to perform a task and/or provide support for the stewardship organization to conduct such an audit.

Further, we would suggest that ecomaine is well-situated to achieve a holistic view from such audits for southern Maine, given the consolidated footprint of both the recycling and solid waste streams on our campus. We would look forward to these conversations with the Department and the stewardship organization in the future.

Thank you for the opportunity to discuss our thoughts on this part of the EPR program; I would be more than happy to answer any questions.

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**DO** recycle

**PAPER**

- All clean cardboard, paperboard, & pizza boxes (*NO FOOD*)
- Newspaper & inserts
- Magazines
- Mail & catalogs
- Paper bags
- Office paper, envelopes, & window envelopes
- Wrapping paper
- Phone books
- Books
- Paper plates (*clean*)
- Milk & juice cartons
- Drink boxes & aseptic containers
- Shredded paper  
(*put in clear plastic bags - this the ONE exception to our 'no plastic bags' rule!*)

**PLASTIC**

- Water bottles
- Milk jugs
- Detergent bottles
- All rigid containers marked #1-7 (*except Styrofoam*)

**METAL**

- Tin cans
- Aerosol cans (*empty*)
- Aluminum cans & foil
- Pots & pans

**GLASS (all colors)**

- All glass bottles & jars

**All rigid containers must be EMPTY (not perfectly clean)**



This is not a complete list! Search more than 1,500 items at [ecomaine.org/101](http://ecomaine.org/101)

**DON'T** recycle

**NO PLASTIC BAGS!**



**Plastic bags & wrap:**

- Trash & shopping bags (*empty or full*)
- Plastic wrap or film
- Bubble wrap or mailers
- Tyvek or plastic envelopes
- Bread bags
- Potato chip & snack bags
- Sandwich baggies
- Animal food bags
- Frozen vegetable bags
- Pellet bags
- Newspaper bags
- Boat wrap or tarps
- Straws & cup lids
- Styrofoam (*even if it's #6!*)
- Paper towels, napkins, or tissue
- Needles & sharps
- Large metal parts
- Gas tanks (*propane, helium, oxygen, etc.*)
- Wood & lumber
- Pipes (*metal or plastic*)
- Clothing & shoes
- Bedding & pillows
- Batteries:  
*alkaline*  
*button-cell*  
*rechargeable & lithium-ion*
- Light bulbs (*any type*)
- Garden hoses
- Diapers (*baby or adult*)
- Food or plants (*compost these*)
- Kitty litter
- Knives & blades
- Toys
- Vinyl siding
- Wax-coated paper & boxes
- Rope, string, chain

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**Do not bag recyclables** No garbage  
**No plastic bags or film** Return to retailers  
*(Check out [www.plasticfilmrecycling.org](http://www.plasticfilmrecycling.org))*

ecomaine's **THREE RULES OF PLASTIC RECYCLING**

Plastic containers - except Styrofoam - are recyclable if they meet ALL three of these rules:

1. It must have a #1-7 recycling symbol
2. It must be rigid, or hard plastic
3. It must be a container



**No batteries of any kind**  
No electronics

**No "tangles"**  
No cords, electronics, hoses, ropes, etc.

**No hazardous waste**  
No explosives - No sharps

**No clothing or linens**  
Use donation programs

**No food or liquid**  
Empty all containers

Questions? Look up more than 1,500 items on **ecomaine's** FREE Recyclopeda app!  
[www.ecomaine.org/101](http://www.ecomaine.org/101)



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Recycling DO's



**Paper & Cardboard**  
Mixed Paper, Newspaper, Magazines & Junk Mail, Cartons & Boxes

**Metal**

Food & Beverage Cans  
Clean Foil, Pots & Pans  
(empty, please!)



**Plastic**

Bottles, Jars, Jugs, Cups & Tubs  
rigid containers #1-7  
(empty, please!)



**Glass**

Bottles and Jars  
(empty, please!)



All other material should go into your trash!

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Recycling DON'Ts



Do Not Bag Recyclables



No Plastic Bags or Plastic Wrap  
(return to retail)



No Food or Liquid  
(no garbage)



No Styrofoam of any kind



No Electronics, Batteries, or Appliances



No Big Items  
(no wood, furniture, or scrap metal)



No Tanglers  
(no hoses, ropes, chains, or cords)



No Clothing or Linens  
(use donation programs)



Questions? Ask the Recyclopeda at [ecomaine.org/101](http://ecomaine.org/101)



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