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Sent: Monday, March 18, 2024 3:29 PM
To: DEP Rule Comments
Cc: Kevin Roche
Subject: Comment on Chapter 428: Stewardship Program for Packaging

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Re: Written Comments in Support of Stewardship Program for Packaging Rules

Chair Lazard and Members of the Board,

Following up on the remarks we offered at the March 7, 2024, Board of Environmental Protection public hearing held on this item, ecomaine appreciates this opportunity to submit expanded comments to express our strong support for the rules under consideration.

As a municipally owned, non-profit leader in recycling and sustainable waste management serving 74 member communities throughout Southern, Central, and Midcoast Maine, ecomaine is committed to promoting sustainable waste management practices. We recognize the urgent need for comprehensive strategies to address the growing issue of packaging waste. The introduction of a Stewardship Program for Packaging represents a proactive approach to tackling this challenge and advancing the principles of extended producer responsibility (EPR).

Here are several key reasons why we believe a Stewardship Program for Packaging is essential:

1. **Producer Accountability:** A Stewardship Program for Packaging holds producers accountable for the entire lifecycle of their packaging materials, including collection, recycling, and proper disposal. By shifting responsibility to the producers, this program encourages them to adopt more sustainable packaging practices and invest in innovative solutions for waste reduction.
2. **Promotion of Recycling Infrastructure:** The implementation of a Stewardship Program for Packaging provides funding and support for the development and enhancement of recycling infrastructure. This investment is critical for expanding recycling capacity, improving collection systems, and increasing the efficiency of material recovery processes.
3. **Reduction of Environmental Impact:** Packaging waste poses significant environmental challenges, including pollution, habitat destruction, and resource depletion. By promoting the responsible management of packaging materials, a Stewardship Program for Packaging helps mitigate these impacts and protects our natural ecosystems for future generations.
4. **Cost Savings for Local Governments:** The financial burden of managing packaging waste often falls on local governments and taxpayers. A Stewardship Program for Packaging alleviates this burden by providing producers with the responsibility and funding necessary to manage packaging waste effectively. This, in turn, frees up resources for local governments to invest in other essential services and infrastructure projects.
5. **Job Creation and Economic Growth:** The implementation of a Stewardship Program for Packaging stimulates demand for recycling services and fosters innovation in the waste management sector. This, in turn, creates job opportunities and contributes to the growth of a sustainable green economy.

As you consider the rules and their implementation, we offer a few points we think should be kept in mind to allow for the greatest opportunity for success of the program:

- In recognition of the top rung of the waste hierarchy, we first and foremost want to *reduce* the amount of waste. To realize that goal, it is critical that the incentive structures disadvantage the least desirable option – landfilling.
- Regarding alternative collection programs (ACPs), they must be as convenient as the alternative, which is simply throwing something away. There is ample evidence that supports the fact that mail-in and drop-off programs are cumbersome for the end user and will not produce the desired outcomes.
- Regionalization is needed to incentivize efficiencies of scale and a cooperative approach.
- Support for our communities is needed **now**. At this moment, budgetary constraints and operational challenges are forcing cities and towns across Maine to make short-sighted choices to walk away from their existing recycling programs altogether. This program gives them the shot in the arm they need by providing much needed financial support and incentives to not only continue with their existing initiatives, but also expand them.

In conclusion, ecomaine believes that a Stewardship Program for Packaging is a crucial step towards achieving our shared goals of environmental sustainability and waste reduction. We urge you to support the adoption of these comprehensive rules and regulations that promote producer responsibility and advance the circular economy.

Thank you for considering our perspective on this important issue.

Respectfully,

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