



Town of Brunswick, Maine

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Comments in Support of Proposed Rules for the Stewardship Program for Packaging (Chapter 428) to the Board of Environmental Protection

March 18, 2024

The Town of Brunswick supports Maine's Extended Producer Responsibility (EPR) for Packaging program. Thank you for the opportunity to comment on the proposed rules for Chapter 428, the Stewardship Program for Packaging, established in MRS Title 38 § 2146.

The Town of Brunswick believes in moving up the waste hierarchy. So much so, that despite not having incineration for non-readily recyclable materials accessible to us, we pay our waste contractor *more* to conduct a waste swap. This waste swap allows the *equivalent* of our non-readily recyclable packaging material to get incinerated at ecomaine, instead of going to the landfill. This creates a *net gain* of incinerated non-readily recycled material for the State. Because of this net gain for the State, and added cost to Brunswick residents, we urge DEP to include scenarios such as our waste swap in the definition of "Alternative Management", so that Brunswick taxpayers are fairly compensated for moving up the waste hierarchy.

Brunswick residents are very concerned about recycling rates and package material content. It is important that Maine's EPR law establishes high quality data gathering practices right away. We support strengthening the auditing process for recycling rates and utilizing third-party accountability for recycled content and toxins.

Finally, the fees that producers are allowed to pass on to consumers must be commensurate with the producer's cost of participating in the stewardship program. We urge DEP to set proportional limits on the fees that producers can pass on to consumers, to prevent profiteering from Maine's EPR law.

Thank you for considering our comments on the proposed rules. We are looking forward to the implementation of this important law.

Sincerely,

Julia Henze
Interim Town Manager