



# EPR in Maine - Update

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MRRA Spring Conference April 13, 2026

# Disclaimer

*Regulatory legislation in North America is evolving rapidly.*

*Reclay StewardEdge has made every effort to ensure the accuracy and timeliness of the information provided; however, it is intended for general informational purposes only and should not be interpreted or relied upon as legal advice.*



# OUR MISSION

To inspire and support organizations to implement leading edge, new world solutions for sustainable resource management.

# WHAT WE DO

**Reclay StewardEdge** is an international operator of Producer Responsibility Organizations and provider of EPR consulting services.

Together with our affiliates, we operate PROs in Canada, Germany, France, Austria and Slovakia. We have decades of experience in Extended Producer Responsibility (EPR) policy development and guiding industry through regulatory and compliance challenges, opportunities and the implications of government mandated EPR policies

# Extended Producer Responsibility (EPR): A Global Program



The goal of Extended Producer Responsibility (EPR) for packaging is to **reduce packaging volumes, increase recycling/collection, improve recyclability and support circular design.**

EPR is no longer niche, it's becoming standard policy in major markets. The EU's proposed **Packaging & Packaging Waste Regulation (PPWR)** was introduced in 2025 and represents one of the largest overhauls of packaging law in decades; similar programs are being implemented or proposed in the UK, Canada, the US (state-by-state), India, China and elsewhere.

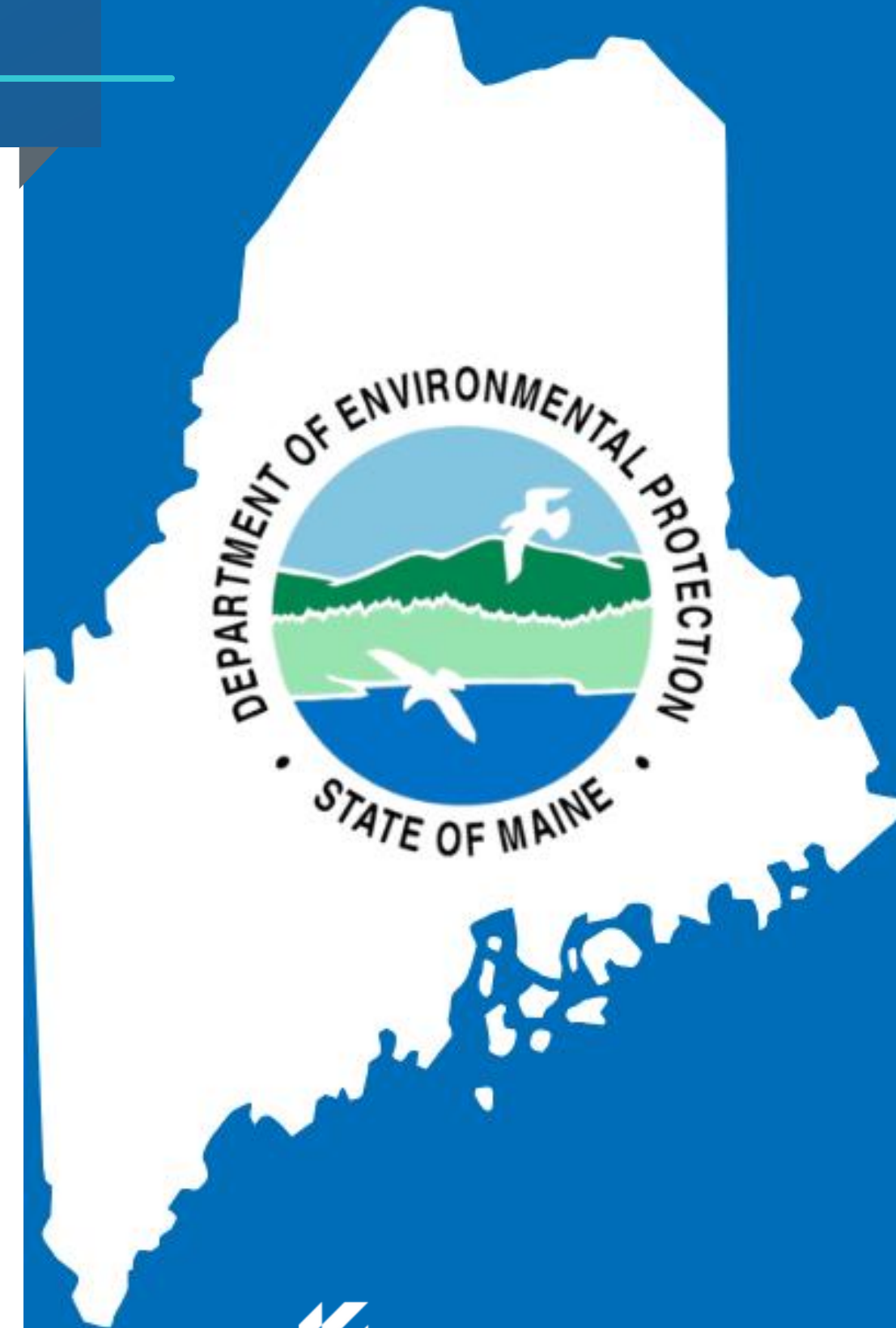
On a local level, **EPR represents a shift from municipal to producer-funded waste management:** governments are requiring producers to finance/operate end-of-life management for packaging and to stimulate better design and system innovation.



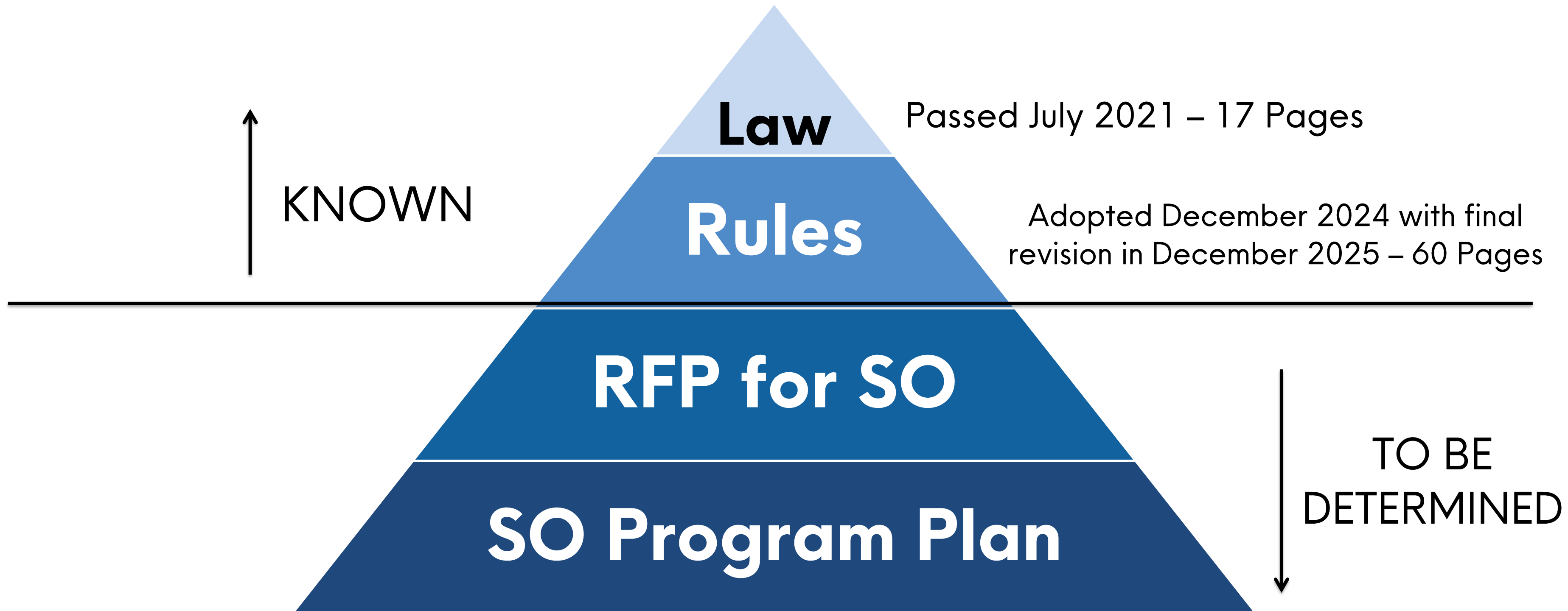
# Maine Specific EPR

## Agenda

- What do we know?
- Timeline
- What does a municipality have to DO?
- Opting In – Contact Information
- Determining Median Per Ton Cost
- Similar Municipalities
- Timing and Cost application
- Packaging Material types list
- Alternative Collection Programs

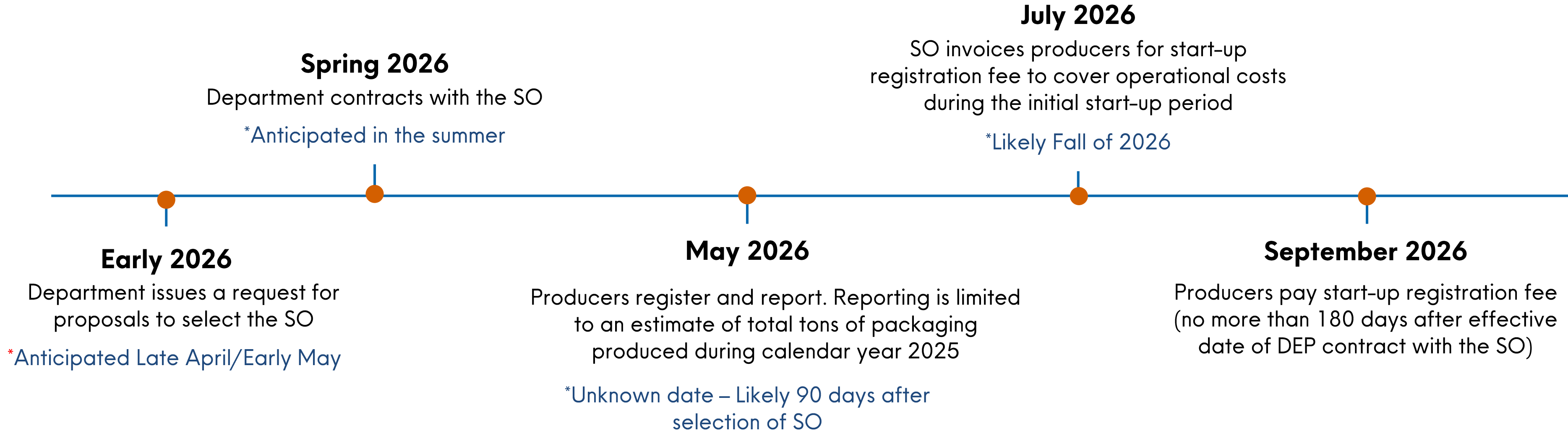


# What Do We KNOW As Of Today?



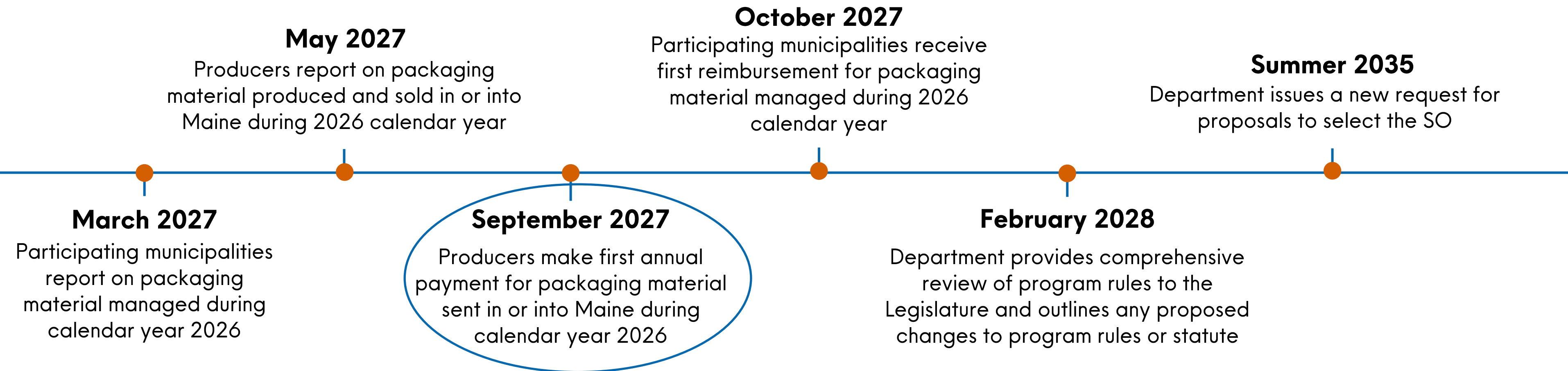
# TIMELINE

## Anticipated Schedule for Implementation 2026



# TIMELINE

## Anticipated Schedule for Implementation 2027



# What Do YOU Have To Do (As a Municipality)?

- Opt in to the program
- Completely voluntary
- May elect only certain commodities to start
- (DEP is currently accepting emails and compiling a list of interested Municipalities)

- Provide for the collection and recycling of any packaging material types that have been designated readily recyclable
- 4 Categories
  - Readily Recyclable
  - Compostable
  - Reuse
  - Non-readily recyclable

## Report:

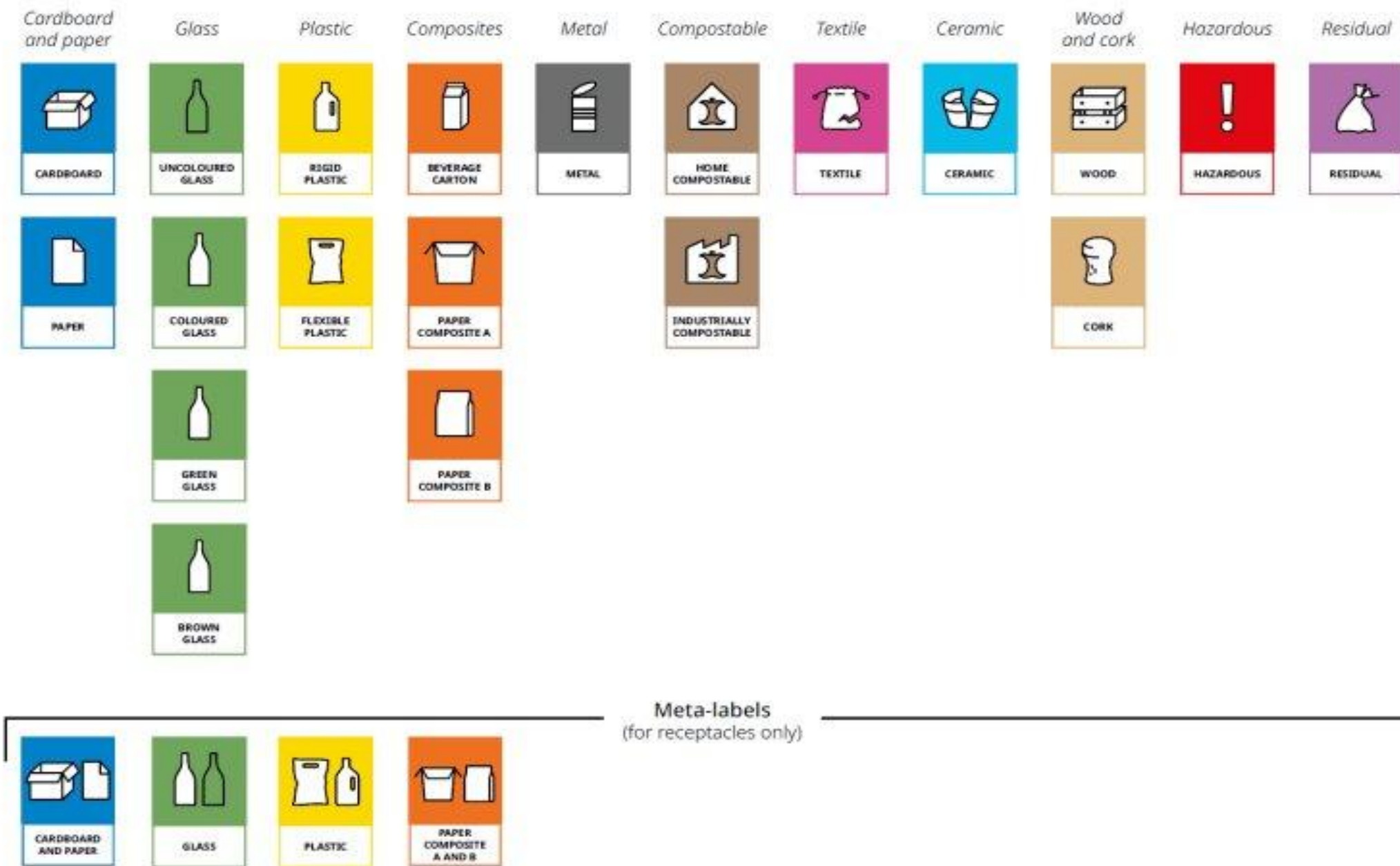
- Tonnages collected and sorted by the 4 categories to the SO by March 31<sup>st</sup>
- On a form approved by the Department
- May be reported by a facility that manages the packaging material under certain circumstances

Start working with your facilities / service providers and internal personnel to gather tonnage and costing data NOW

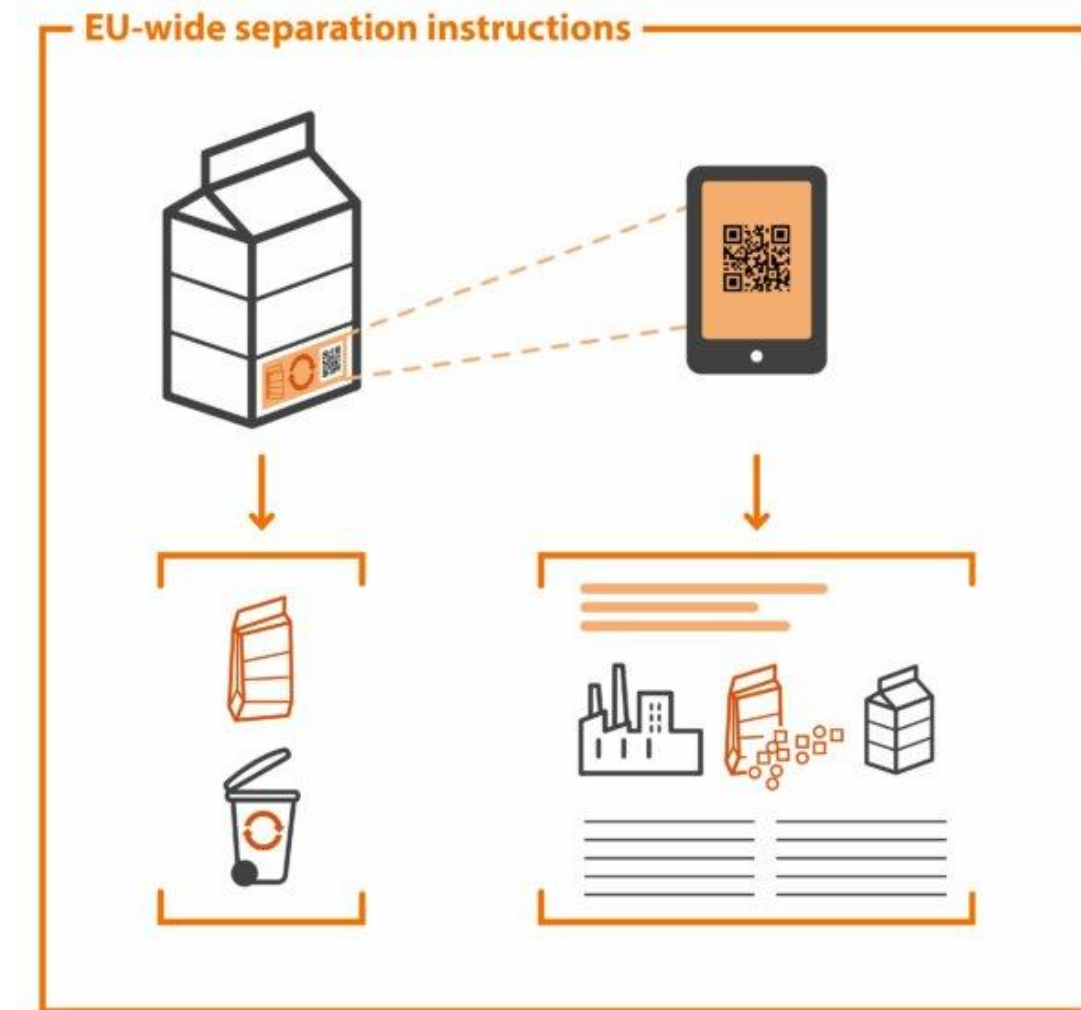
**\*\*\* there may also be the occasional need to participate in a cost study if randomly selected**

# Harmonizing Consumer Compliance With Waste Sorting Labels

Figure ES 1. Final label proposal (colour and text)



Source: Author's elaboration.



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# How To Show Interest In Opting In – For Now

## Contact DEP

Municipalities that are interested in participating in the packaging program began indicating their interest through the 2025 Municipal Recycling Report.

Municipalities will also be able to indicate their interest in the 2027 Municipal Recycling Report.

In the interim, municipalities that are interested in participating in the packaging program are informing the Department by emailing [MainePackagingEPR@maine.gov](mailto:MainePackagingEPR@maine.gov).

# Determining The Median Per Ton Cost – Use Current Cost Studies

## By Commodity

- Metal
- Glass
- Plastic (each grade)
- Fiber
- Etc

## End Use

- Recycling
- Reuse
- Composting

## By Similar Municipality

4 groups listed in Statute

# Similar Municipalities

**Purpose:** Used to determine the Median Per Ton Cost of Recycling (Average cost of recycling for all municipalities in the same group)

**Pro:** If you run a system with lower costs than similar municipalities then you will be reimbursed a high % of your overall costs.

**Con:** If you run a system with higher costs than other similar municipalities then you will be reimbursed a lower % of your overall costs

# Similar Municipalities

## Population over 6,500

Lincoln, Penobscot, Knox, Kennebec,  
Cumberland, York, Androscoggin, and  
Sagadahoc

## Population over 1,200

Oxford, Franklin, Washington, Aroostook,  
Piscataquis, Waldo, Hancock, and  
Somerset

## Population under 6,500

Lincoln, Penobscot, Knox, Kennebec,  
Cumberland, York, Androscoggin, and  
Sagadahoc

## Population under 1,200

Oxford, Franklin, Washington, Aroostook,  
Piscataquis, Waldo, Hancock, and  
Somerset

**A Municipality that disagrees with its grouping may contact DEP before the next annual reporting and provide justification for review**

# Timing and Cost application

SO must reimburse participating Municipalities by **OCTOBER 1, 2027**; based on tons recycled, reused or composted using median cost per ton

Disposal / Landfill costs will NOT be reimbursed

The value received from the sale of commodities will be used as part of the Median Cost per ton calculation.

It will NOT be used as an offset to reimbursements from the SO.

## Readily Recyclable

Reimbursed for each ton recycled at the median per ton cost of recycling this packaging material type as realized by similar municipalities during the previous calendar year

## Compostable

Reimbursed for each ton composted at the median per ton cost of composting the packaging material type \*

## Reusable

Reimbursed for each ton reused at the median per ton cost of reusing the packaging material type \*

## Not Readily Recyclable

Reimbursed for each ton recycled at the average median per ton cost of all readily recyclable packaging material as realized by similar municipalities during the previous calendar year

\*If there is no median per ton cost available for Reuse or composting, then use the readily recyclable or not readily recyclable rate depending on what the package material type is

# Packaging Material Types List

## Example (67 categories)

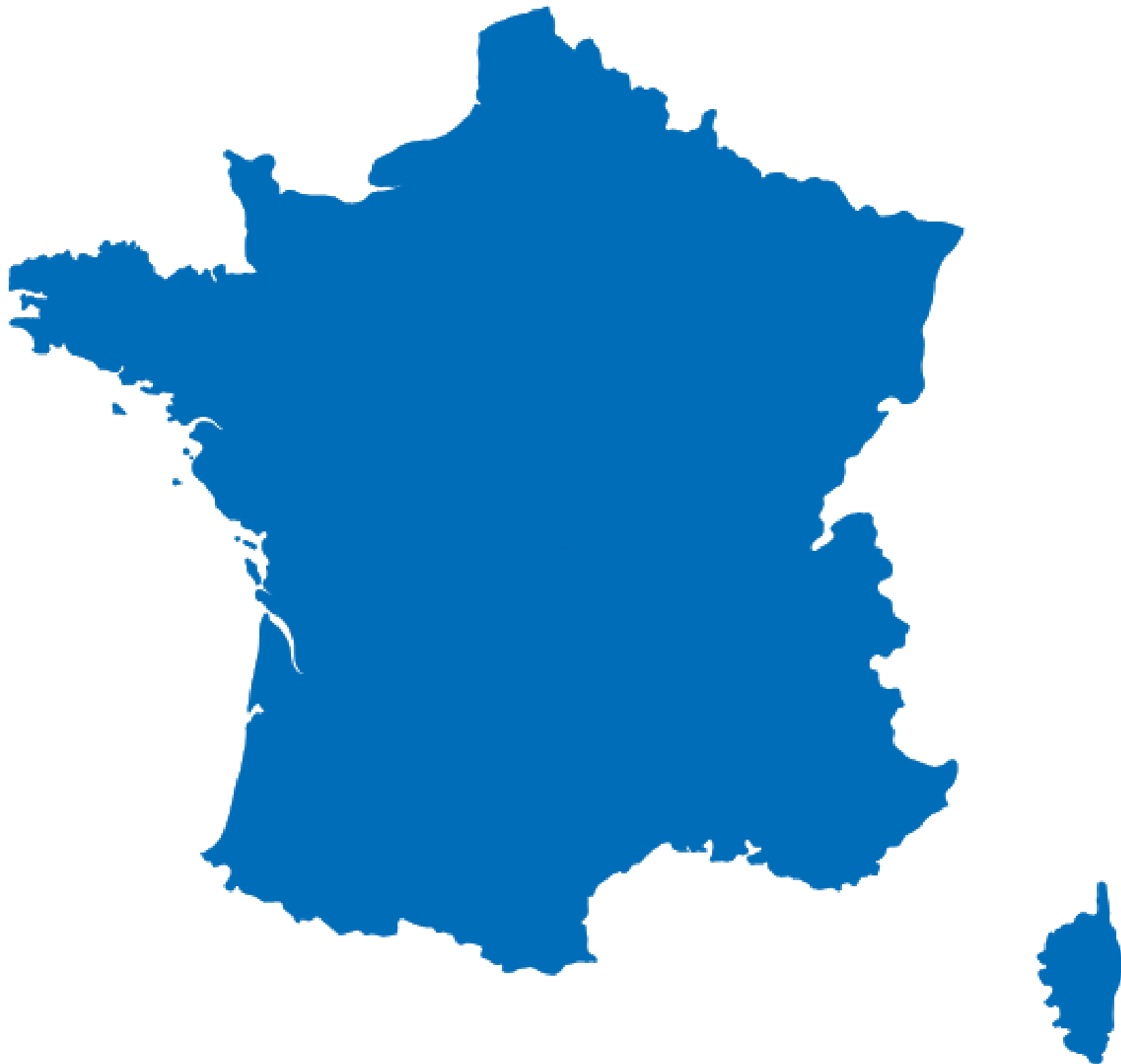
| Base Material           | Packaging Material Type   | Description  | Readily Recyclable | Compostable: Includes material certified to ASTM D6400, ASTM D6868, or ASTM D8410 | Reusable: Includes material collected by a Department approved Alternative Collection Program (ACP) |
|-------------------------|---|--|--------------------|---|---|
| <b>Glass</b>            | Glass - clear containers  | Clear bottles, jars, jugs, and other containers that are comprised of at least 60% container glass by weight.  | Y                  |   |   |
| <b>Metal</b>            | Aluminum forms  | Rigid containers and lids with a diameter of more than 2 inches that are comprised of at least 60% aluminum by weight. Including any closure, of the same base material as its container, that is designed to be reattached for end-of-life management.  | Y                  |   |   |
| <b>Paper</b>            | Corrugated cardboard  | Cardboard (consisting of a fluted corrugated sheet and one or two flat linerboards) that is not coated (other than clay, varnish, starch, or other water-soluble coating) or laminated, and is comprised of at least 90% paper by weight.  | Y                  | ✓   |   |
| <b>Wood/cork</b>        | Wood/cork forms   | Rigid forms made of treated and untreated wood, cork, bamboo, or other non-synthetic organic.  | N                  | ✓   |   |
| <b>PET (#1)</b>         | Polyethylene terephthalate (PET #1) clear bottles, jugs, and jars   | Rigid, clear or transparent, including transparent blue or transparent light green, PET (#1) bottle, jug, jar, or other blow-molded form displaying #1 and comprised of 60% PET (#1) by weight. Including any closure, of the same base material as its container, that is designed to be reattached for end-of-life management. | Y                  |   |   |
| <b>HDPE (#2)</b>        | High-density polyethylene (HDPE #2) natural bottles, jugs, and jars | Rigid, natural HDPE (#2) bottle, jug, jar, or other blow-molded form displaying #2 that is comprised of at least 60% HDPE (#2) by weight. Including any closure, of the same base material as its container, that is designed to be reattached for end-of-life management.   | Y                  |   |   |
| <b>PVC (#3)</b>         | Polyvinyl chloride (PVC #3) forms                                   | Rigid and flexible PVC (#3) forms.   | N                  |   |   |
| <b>LDPE (#4)</b>        | Low-density polyethylene (LDPE #4) bottles, jugs, and jars          | Rigid LDPE (#4) bottle, jug, jar, or other blow-molded form displaying #4 that is comprised of at least 60% LDPE (#4) by weight. Including any closure, of the same base material as its container, that is designed to be reattached for end-of-life management.  | N                  |   |   |
| <b>PP (#5)</b>          | Polypropylene (PP #5) bottles, jugs, and jars                       | Rigid PP (#5) bottle, jug, jar, or other blow-molded form, displaying #5 that is comprised of at least 60% PP (#5) by weight. Including any closure, of the same base material as its container, that is designed to be reattached for end-of-life management.   | Y                  |   |   |
| <b>PS (#6)</b>          | Polystyrene (PS #6) non-expanded forms                              | Rigid PS (#6) forms that are not expanded, displaying #6, and are comprised of at least 60% PS (#6) by weight.   | N                  |   |   |
| <b>Mixed resin (#7)</b> | Mixed resin (#7) flexible and film forms                            | Flexible and film forms comprised of other (#7) plastic resins or multiple plastic resins where none contribute at least 60% by weight to the composition and plastic is the primary component.  | N                  | ✓   |   |

# Alternative Collective Programs

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- ✔ Allows for creative and different waste streams for certain commodities that will help reduce contamination
- ✔ Must provide collections that are free, available year-round and convenient
- ✔ Must be approved by DEP
- ✔ Currently no alternative programs have been submitted or approved

# Funding Architecture – France



- Producers pay eco-fees (€/unit, €/tonne, eco-modulated)
- Funds managed by Stewardship Organizations (Citeo, Léko)
- ~85% redistributed to municipalities
  - Rest is going to communication and special projects
- France = financial EPR model (municipalities remain operational)
- Not full cost recovery – standardized financial support system

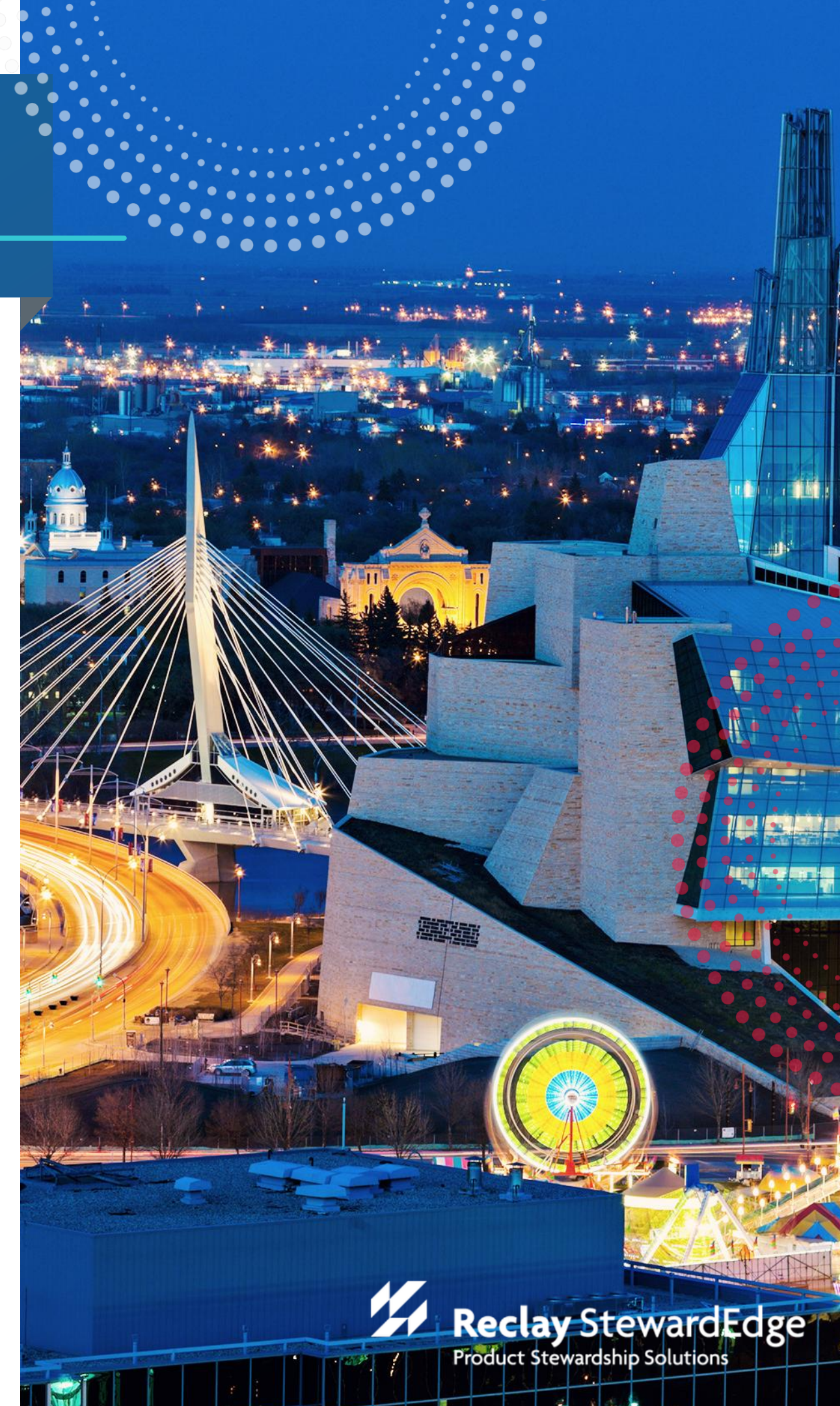
# France - Municipal Support Formula

- Support =  $\Sigma$  (tonnes by material  $\times$  €/tonne rate)
  - Collection support (curbside, bring banks)
  - Sorting support (€/tonne sorted)
  - Based on national reference costs (not actual costs)
  - Bonuses for high capture rates and good sorting quality, Reduced payments if performance is weak
- Communication funding & investment co-financing (=infrastructure development)
- Additional supports: overseas, reuse systems, local communication
- Complex system with uneven municipal outcomes
- Has led to municipalities sharing recycling responsibilities (especially sorting)

# EPR In Manitoba, Canada

## Who pays & How Much?

- Packaging producers fund recycling through Multi Material Stewardship Manitoba (MMSM) – the Stewardship Organization
- MMSM reimburses municipalities for up to 80% of recycling system costs
  - Funding is based on tonnes recycled
  - Funding 100% of **optimized** cost expected from 2027
- Payments (funding) come from producer fees on packaging and printed paper (incorporated into price) based on the type and quantity of packaging and printed paper supplied into the market



# Municipal Funding under EPR in Canada

## How it works?



SO conducts annual cost studies that establish average net system costs for collection and processing.

**Eligible costs include:**

- Collection, transportation, processing & marketing
- Program promotion and education



### Municipality signs agreement with SO

- Municipality: operates or contracts residential recycling services
- Reports verified tonnes collected



### SO: reviews data and applies per-tonne funding rate

- Issues regular reimbursement payments (quarterly/annual)
- Communities are grouped by population and submit regular reporting for reimbursement
- Payment rates reflect a three-year rolling median cost from provincial cost studies

### 2026 Example Rates

- 0–5,000 population: \$499/tonne
- 5,001–20,000 population: \$395/tonne

# Contact Us

With a proven track record and **decades of experience**, we find and implement impactful **tailored-made solutions** because your business is unique.



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# Discussion

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