

NRCM Feedback to the Maine Department of Environmental Protection
Regarding Materials Management Plan 2024

Focus on Problematic Materials

- Biosolids/Sludge – address need for reducing toxics in and drying sludge for safe and stable landfill storage; be hyper vigilant in any PFAS removing technology claims
- E-Waste and HHW – communities are struggling to cover the costs of these collections and there is confusion from residents on what to do with these items; rework E-waste EPR law to include more materials and expand participation as well as support an EPR program for HHW
- Food Waste – State should find a disposal ban strategy that they can support so that legislative efforts are successful at supporting waste reduction infrastructure
- CDD – pilots and research for deconstruction (someone in Portland mentioned the tonnage of a home demo is more than one person's lifetime MSW generation... we need deconstruction and support for market development for reusing building materials as well as building future building with deconstruction in mind)
 - Anticipating more emergency debris as a result of climate change

Infrastructure Needs

- Composting/Anaerobic Digestion – there are some existing incentives and infrastructure for businesses (restaurants, grocers, and others) to begin diverting food waste. The food waste generated at the commercial/municipal level is an ideal starting point for more efforts to increase food recovery and improve coordinated collection. Research needed to quantify volumes at different points of generation and identify where more composting capacity is needed, and local/statewide policies are needed to ensure maximum recovery of this GHG-emitting waste stream.
- Reuse infrastructure should be a priority for EPR and for the State washing capacity, coordination and widespread use of shared packaging needed for this to be achieved at a grand scale. Reuse systems allow for the prevention of waste altogether and keep materials in Maine.
- Need for piloting capacity for deconstruction and entrepreneurship to address these challenging materials.

Needs Related to EPR

- Reporting for recycling and waste diversion reports is missing – municipalities are not submitting these reports regularly and maybe this is an opportunity to incorporate new software and technology into municipal reporting that makes it easier to update regularly.
- Extra help from the State in encouraging municipal participation in EPR and making sure that municipal waste contracts with haulers require the data needed to participate in the program and get maximum benefit
- Accurate labeling for product/package disposal is going to continue to pose a challenge for municipal recycling. At a national level, we need more standardized labeling and also uniform waste collection systems throughout the state and supported by DEP (color-coded, labeled bins, etc). We would benefit from a set of best practices for standardizing

recycling/composting/landfill colors, readily recyclable materials, and other guidance for communities, businesses, and others.

- NRCM is concerned about possible contamination of recyclable materials and reduced recovery that may happen as a result of sorting commingled recycling and/or waste. Studying the quality of materials collected through different recycling programs would be beneficial, and NRCM recommends that the Department and the Stewardship Organization both provide consistent best practices and incentives that allow for readily recyclable materials to be accurately separated and recovered for recycling into new materials rather than be converted into fuel

Other Concerns

- Increasing DEP capacity and more staff for oversight/enforcement/expansion of materials management programs
- More coordination with local/regional groups (repair café, public works directors, etc) facilitating regular meetings to address issues/solutions
- Challenge of reliance on private, for-profit sector – shifting the perspective of solid waste management to a public utility with goal of maximum recovery rather than a business with material commodities
- Definition of recycling is different across statutes/programs/etc, which causes confusion and possible compliance issues. We would urge the Department to create a uniform definition of these waste terms. For recycling in particular, we do not support a definition of recycling that includes converting materials to fuel, beneficial use, or use of material as alternative daily cover in a landfill.