

Manufacturers Association of **Maine**

2025 Executive BOARD

22 April 2025

Chair of the Board

Brad Hittle

American Rheinmetall

Vice Chair of the Board

Derek Fox

Elmet Technologies

Treasurer & Investment Chair

Samantha Pedersen

Albin, Randall & Bennett

Secretary & Business Svcs. Chair

Neal Prescott

Prescott Associates

Past-Chair

Judith Borelli

Texas Instruments

Executive Director

Mike Roughton

Senator Tepler, Representative Doudera, and members of the Joint Standing Committee on Environment and Natural Resources:

I am Mike Roughton and I'm submitting testimony on behalf of the Manufacturers Association of Maine (MAME) in support of the Department of Environmental Protection's proposed amendment to LD 1423.

The Manufacturers Association of Maine ("MAME") is a non-partisan 501(c)6 non-profit grounded in service to its membership, providing a network of resources designed to support the strategic business growth needs of Maine manufacturing entrepreneurs. Maine's manufacturing businesses are diverse, employing almost 60,000 individuals in military and defense, aerospace, metal fabrication, paper, boat building, semi-conductor, wood products, aquaculture and biotech, medical device, composites, and bioplastics, as well as the food and beverage industries. These businesses represent almost 10% of Maine's annual GDP and 10.4% of all the wages paid in the state on a weekly basis. MAME's mission is to help manufacturing grow and succeed and supports Maine's development of future manufacturing assets through a variety of programs.

Representing over 300 manufacturers and service providers across Maine — a diverse and innovative sector that is deeply committed to sustainability and environmental responsibility — we support the goals of Extended Producer Responsibility (EPR) for packaging and have actively participated in efforts to create a fair, functional program.

However, as introduced, LD 1423 raised significant concerns for the manufacturing sector. The bill's scope, definitions, and regulatory requirements — while well-intentioned — were overly broad and would have created unsustainable cost burdens for producers, including those already operating within highly regulated federal frameworks. Small and mid-sized manufacturers in particular would have struggled to navigate and absorb the program's requirements as originally written.

We believe the amendment now before the Committee offers a far more workable path forward. While not resolving every concern, it reflects thoughtful revisions developed in close consultation with stakeholders and with the Department's leadership.



Among its key improvements:

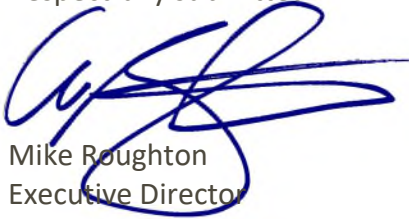
1. Clarification of "consumer" to exclude B2B packaging and manufacturing-related materials that are already collected and paid for by the producer — reducing redundant regulatory overlap.
2. Refinement of the definition of post-consumer recycled content (PCR) to include pre-consumer "broke" materials and to avoid penalizing the use of materials where the incorporation of PCR is restricted by food safety or medical regulations.
3. Adoption of a clearer definition of "producer" that aligns with other states' frameworks and improves compliance clarity for manufacturers with complex supply chains.
4. Improvements to the definition of "toxicity" by incorporating the "intentional addition" standard, avoiding broader changes that could lead to unpredictable enforcement or litigation risk.

While the amended bill does not address every outstanding issue, it represents a meaningful compromise. It protects the integrity of Maine's EPR program while giving producers — including our members — a fairer, more predictable regulatory structure to work within.

We appreciate the Department's leadership and the Committee's continued engagement on this issue. MAME supports the amended version of LD 1423 and urges its adoption.

Thank you for your time and consideration.

Respectfully submitted. . .



Mike Roughton
Executive Director

