



Advisory Council Meeting #25

Producer Responsibility – Packaging
and Paper Products



Maryland
Department of
the Environment

Feb 20, 2026

Housekeeping

- Appointed advisory members must provide if they are in attendance via the “chat” function indicating their name and affiliation or their attendance will not be recorded.
- Remain on mute so that no background noise disrupts any speakers or inquiries
- Please use the raised hand function so that all persons have the opportunity to provide feedback. Public comment is reserved for the last 10 minutes of the meeting.

Agenda Feb 20 Meeting #25



- Submissions by Council (last week's homework)
- Responsibility Plans - Rulemaking
- Public Comment Period

Information provided for consideration of rulemaking associated with the curbside list

Provided by Mario Minor

Commercial - Retail

Suggested Definition to Include:

“On-Site Collection Service” means a regularly scheduled recycling or compostable materials collection service in which a commercial generator places materials in designated containers at a defined collection area on the property for pickup by an authorized hauler.

Why this matters:

- Commercial properties often use **dumpsters, compactors, shared enclosures, and interior collection areas**, not curbside carts.
- The emphasis is on **service frequency, container adequacy, and accessibility**, not on where the container is physically located.
- This language is compatible with typical **commercial recycling and organics diversion requirements** that I believe many Maryland jurisdictions adopt.

QUESTION

What should be included or addressed in regulations?

Producer Responsibility Plans

Process of Plan Review and Approval



- §9-2505(b)(1) - Should the process of review and approval of plans and subsequent requirements by the Department adhere to specific timelines? For approvals of plans, where the Department has required/suggested edits, what is the process of including stakeholders?
- §9-2505(b)(2) - Should there be specific rules defining the process of review and approval of Advisory Council recommendations including such defined criteria as timeline, response to recommendations, etc.?
- For any portions of responsibility plans that are to be developed at a future time, that are included after a Department approval, what requirements should be added for oversight in rule making?
- §9-2505(b)(2)(i) - What is meant by “consult with the advisory council”? What is the responsibility of the PRO or individual producer in this consultation? Does clarification need to be made in regulations regarding the process of incorporating feedback received through consultation? Should there be a requirement for PRO, individual producers, and alternative collection programs to detail their consultation with existing local programs or provide responses ?

Plan Content



- Education and Outreach
 - Should there be required criteria for education and outreach materials provide by the PRO, service providers, and/or alternative collection programs? Should there be defined criteria for approval or consensus regarding educational or other materials provided, as well as the timeline for approval?
 - For any materials (e.g. educational materials) provided through a PRO, IPP or Alternative Collection Program, should there be a required timeline for providing materials in regulation?
- Are there other plan requirements that require timelines and/or criteria for approval?

Different kinds of plans



- Should there be language specific to Producer Responsibility Plans vs. Independent Producer Responsibility Plans vs. plans submitted by producers who establish an Alternative Collection Program?

PRO and oversight



- What protections should the Department establish to ensure that Maryland-specific interests are considered in the plan? Considerations that align with east-coast markets, existing infrastructure (physical and social), and the mid-atlantic circular economy.
- Should there be specific language related to the PRO's responsibilities as they pertain to oversight?

Definitions: defined or clarified, or are there additional terms:

- “Waste Reduction” (and its relationship to source reduction)
- “High Recycled Content” & “Low Recycled Content”
- Minimum Recyclable or Compostable List
- “Responsible End Markets” (defined in Statute)

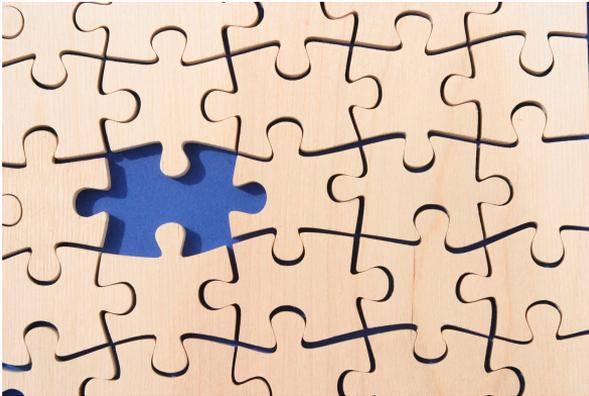


Performance goals & metrics



- What might need to be specified concerning greenhouse gases and how they are defined and measured? E.g: What type of carbon emissions need to be considered (Scopes 1, 2 and 3)? When greenhouse gas reduction goals are set, how are Maryland-based emissions considered in the goal-setting (vs. considering global emissions)?
- Should standards for measuring performance goals be identified in regulation?
Reference: §9-2505(c)(1)(iii).

Other producer responsibility plan topics?



HOMework

If you have recommendations on language (text) for regulations related to “producer responsibility plans”, please send them to mde.epr@maryland.gov by **March 1**.



Next meeting(s) Date/Time

March 3 - 1-3p-Anticipated Discussion* Reuse Refill

Video call link: <https://meet.google.com/cdj-cmoy-dzg>

Or dial: (US) +1 636-498-4610 PIN: 817 268 196#

***Public
Comment***





Resource Links

State Specific Links: [Maine](#), [Oregon](#), [Colorado](#), [California](#), [Minnesota](#), [Washington](#)

Maryland Specific Information

- [Regulations Impacting Small Businesses \(signup\)](#)
- [Archived MD Advisory Council Meetings](#)
- [MD Needs Assessment \(pub. 2025\)](#)
- [Link to Environmental Articles beginning §9-2501](#)
- [MD Register](#)
- [Draft regulations and proposed guidance document \(closes March 9, 2026\)](#)

To be added to the list notification for all EPR PPP discussions, please send a request to mde.epr@maryland.gov