



Maine EPR (Packaging Stewardship Program)

Producer Snapshot & Compliance List

As of July 2026.

This summary is provided for information only and is not compliance or legal advice. Please confirm applicability to your specific products and packaging with counsel and regulators.

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Program Overview

Maine operates the country's only fully state-funded packaging EPR program, with producers covering 100% of municipal costs to manage covered packaging. It relies on a Stewardship Organization (SO) model that gives the state more control than the PRO model used elsewhere, and CAA has signaled it will bid for the SO role.

Stewardship Organization	Not yet selected. CAA intends to bid on Maine DEP's RFP this summer.
Scope	Packaging and some foodservice ware. Paper products NOT included
Funding Model	Full system funding. Producers reimburse participating municipalities for all packaging management costs
Program Start	Launch expected 2026. First municipal reimbursements in 2027
Fee Model	Start-up fees beginning September 2026, then full program fees once plan approved
First Reporting	CY2025 Start-up Report expected Q3 2026 (total supply weight only). First full material reporting March 2027
Rules Status	Maine's Board of Environmental Protection adopted final rules in February 2026; the SO RFP came out June 15, 2026.
CAA Initial Registration	Undetermined; likely July 2026, or January 30, 2027 if CAA wins the SO role

IMPORTANT: There's no CAA producer action to take right now. SO selection hasn't wrapped up, but CAA is the probable choice. Once an SO is named, registration and reporting guidance will follow; until then, keep an eye on Maine DEP's rulemaking notices.

Where Things Stand (Regulatory Status)

- **Rulemaking:** Maine DEP held an October 16, 2025 public hearing on the revised rules and Appendix A (the initial material types list), and the Board of Environmental Protection adopted the Chapter 428 update, which added Appendix A, in February 2026.
- **SO Selection:** CAA plans to bid once the RFP lands. DEP says it is coming soon, though the original Spring 2026 contracting target has slipped and no new schedule has been posted.
- **Program Plan:** No program plan requirement under the Stewardship Organization model. Maine DEP has more direct regulatory control than PRO-model states.
- **Scope:** Packaging and some foodservice ware only.

- **Fee Timing:** registration was first pegged to July 2026, start-up fees to September 2026, and first material reporting to March 2027; all now hinge on the delayed RFP and SO selection. CAA's March 2026 update told producers no CAA action is needed yet.
- **Municipal Reimbursement:** First payments to participating municipalities are due in 2027, the feature that most sets Maine apart from partial-funding states.

2026 Key Operational Milestones

Date	Milestone	Producer Action
Q1 2026	DEP adopted the Chapter 428 update with Appendix A (February 2026)	Check the final Appendix A list against your portfolio
Spring 2026	SO RFP released (June 2026)	CAA will submit a response. No producer action required
Spring/Summer 2026	SO contract expected to be awarded	Identify SO; begin planning for producer registration
July 2026 (anticipated)	Producer registration opens	Register with selected SO within registration window
September 2026 (anticipated)	Start-up fees begin	Budget for Maine-specific start-up fee obligation
Q3 2026 (anticipated)	CY2025 Start-up Report DUE (total supply weight only)	Compile total Maine packaging supply weight
January 30, 2027	CAA (if selected) initial registration with state	Follows standard SO process
March 2027	First full material reporting DUE	Detailed supply data required, similar scope to other states
2027	First municipal reimbursements begin	Full program delivery starts

Key Watchouts for Personal Care Producers

Watchout	
Different governance model	Maine uses a Stewardship Organization, not a PRO. DEP has more direct regulatory control and authority over operations, pricing, and plan contents than in PRO states.
Full system funding	Producers are responsible for 100% of eligible municipal packaging costs. This is a larger potential fee exposure per pound than in partial-funding states.
No paper coverage	Printing and writing paper is not in scope. This narrows the reporting population compared to Oregon, Colorado, and California.
Foodservice ware partial coverage	Only "some" foodservice ware is covered. Confirm product-specific applicability as Appendix A is finalized.
Timeline is slipping	SO selection and contracting have already been delayed multiple times. Expect further adjustments to producer registration, start-up fees, and first reporting dates.
Start-up fees precede operations	Producers will pay fees in 2026 before full program operations begin. Budget for a pre-operational fee obligation with limited visibility into rate-setting.

Watchout	
SO model limits producer influence	Unlike PRO states where producers set program direction through CAA governance, Maine's SO model means producers have less direct influence over cost structure and priorities.

Resources

- [Maine DEP packaging stewardship page](#)
- [Chapter 428 rule text](#)
- [Chapter 428 regulations](#)
- [Maine DEP March 2026 program update](#)
- [CAA Maine producer page](#)

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