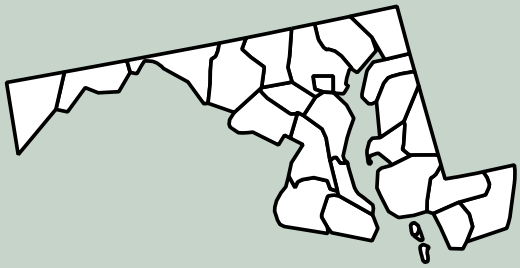
Maryland

EPR Snapshot for Envelope & Mail Producers



Summary

PRO: Circular Action Alliance (CAA) (May not be the sole designated PRO)

Status: Enacted, Rapidly Operationalizing

Upcoming rulemaking: Maryland recently issued proposed EPR regulations; covered materials list due by July 1, 2027.

Maryland enacted its EPR law on May 13, 2025, making it one of the more recent additions to the growing list of states with packaging EPR. The law covers both packaging and paper products, meaning it is broadly relevant to envelope manufacturers. 2026 is a rule and guidance development year — producers should begin monitoring closely and prepare for registration requirements.

What Is Covered

- Packaging materials sold or distributed in Maryland
- Paper products — Maryland's inclusion of paper products alongside packaging makes it one of the broader-scope states

The inclusion of paper products is significant for EMA members. While exemptions and coverage definitions are still being developed in rulemaking, producers should not assume communications paper is excluded until the regulations are finalized.

Practical Takeaways

- Begin tracking Maryland's rulemaking process now — the law is new and definitions are still forming
- Consider engaging with AF&PA and CAA to stay current on implementation developments
- Do not assume communications mail is exempt — monitor for explicit exemptions similar to Colorado's financial/legal paper carve-out

What to Watch

- MDE draft regulations — watch for coverage definitions, exemption structures, and producer thresholds
- Advisory council activity — may influence how paper products are treated

- CAA is expected to play a major implementation role — registration and reporting timelines will follow
- Under the finalized 2026 framework, producers must hold comprehensive weight and brand metrics for a minimum of 5 years and be ready to produce them within 15 days upon request

Key Dates

- May 13, 2025 - Law enacted
- May 31, 2026 - Producer registration opened March 31, 2026; Simplified Supply Report was due
- July 1, 2026 - Final deadline for mandatory producer registration. On this date, CAA formally delivered the registered producer master list to the MDE
- October 29, 2028 - Failing to participate in an approved plan will trigger a strict statewide sales ban on your products beginning

Key Resources

- Maryland MDE EPR Page
- CAA Maryland Page
- CAA Producer Resource Center

Practical briefing only; not legal advice. Consult qualified counsel to determine how EPR obligations apply to your specific products and operations. Last updated October 2026.

