On December 5, 2024, the Maine Board of Environmental Protection adopted *Stewardship Program for Packaging*, 06-096 C.M.R. ch. 428 (2024). According to 06-096 C.M.R. ch. 428, the Department of Environmental Protection (Department) must initiate a formal rulemaking process for the contents of Appendix A, the Packaging Material Types List, within 270 days of the effective date of the rule.

In preparation for the formal rulemaking process, the Department is holding one stakeholder meeting to facilitate discussion and to provide an opportunity for stakeholders to share comments and ask questions on the draft Initial Packaging Material Type List. The meeting is scheduled for Wednesday, April 16, from 9:00 am to 11:00 am EDT in room 25/26 of the Ray Building at 28 Tyson Drive in Augusta. The meeting will also be offered virtually. Use the following link to RSVP for the meeting: Stakeholder Meeting for Packaging Program

This background document includes relevant excerpts from statute and rule, contextual information, and a copy of the draft Initial Packaging Material Types List. To reference the statute and rule, visit the program's website.

The Department requests all comments addressing the draft Initial Packaging Material Types List be emailed to MainePackagingEPR@maine.gov by April 30, 2025.

What is the Packaging Material Types List?

The **Packaging Material Types List** defines packaging material types and includes any associated designations, such as readily recyclable, reusable, or compostable.

- A producer must annually report to the Stewardship Organization (SO) the tons of packaging material it sends in or into the state using the packaging material types defined in the Packaging Material Type List.
- A participating municipality must provide for the collection and recycling of all packaging material types designated readily recyclable.
- The SO will conduct audits of material streams and commodities to allocate costs and amount to each packaging material type.

What is packaging material?

According to 38 M.R.S. § 2146(1)(I), **packaging material** is

> *[…] used for the containment, protection, delivery, presentation or distribution of a product, including a product sold over the Internet, at the time that the product leaves a point of sale with or is received by the consumer of the product. […]*

Any material used to contain, protect, deliver, present, or distribute a product to the product's point of use is packaging material.

Examples:

- An aerosol canister containing hair spray; a plastic tub and wrap used to contain mushrooms; and cardboard, expanded polystyrene, and plastic strapping used to protect appliances, are all examples of packaging material.

What is a product?

According to 06-096 C.M.R. ch. 428 § 2(K), a **product** is

> *[…] an economic good that is marketed or sold.*
>
> > *(1) Material sold for use in containing, protecting, delivering, or presenting items at a later time is a product and, therefore, does not constitute packaging material.*
> >
> > *(2) Charging for, or adding a fee to, packaging material that is used for containing, protecting, delivering, or presenting other purchases does not make that packaging material a product.*
> >
> > *(3) For products that are not durable, material used to contain, protect, deliver, present, or distribute that remains when the product is depleted is not the product; it is packaging material.*

Examples:

- Shopping bags and gift set boxes are examples of packaging material used to contain, protect, deliver, present, or distribute other purchases.
- Whipped cream canisters and propane cylinders are examples of packaging material used to contain, protect, deliver, present, or distribute that remain after the whipped cream and the propane are depleted.
- Plastic film storage bags, glass food storage containers, and gift-wrapping paper and boxes are examples of products.

What is a consumer?

According to 06-096 C.M.R. ch. 428 § (2)(K), a **consumer** is

> *[…] an entity that uses a product, including an entity that uses a product to create a new product or includes its use in a service it provides. A consumer does not include an entity that only distributes, delivers, installs, sells a product at retail, or undertakes any combination thereof.*

The consumer of a product uses that product, uses that product to create a new product, or uses that product to provide a service. An entity that delivers, retails, distributes, or installs a product is not the consumer of that product. The consumer of a product that is delivered, retailed, distributed, or installed is the user of that product.

Examples:

- A salon is not the consumer of the hair spray sold to its customers at the salon; a salon is the consumer of the hair spray it uses in the hair styling services it provides.
- A grocery store is not the consumer of the packages of mushrooms it retails; a grocery store is the consumer of the packages of mushrooms it uses to prepare and sell a new product using the mushrooms, such as a prepared food, like a stir-fry.
- A hardware store that installs an appliance is not the consumer of the appliance; the hardware store is the consumer of the tools used to install the appliance.

How are packaging material types defined?

According to 06-096 C.M.R. ch. 428 § 2(U), a **packaging material type** is

> *"a class of packaging material with similar management requirements, form, and value […]."*

Packaging material will be classified as a packaging material type when it is no longer able to be easily separated without the use of tools. If packaging material cannot be separated without the use of tools, it is classified as a packaging material type based on the primary material or the primary material targeted for recycling.

Examples:

- A cereal bag in a cereal box; a tamper-evident seal on a toothpaste tube; a cotton insert in a supplement bottle; and a lid to a peanut butter jar are examples of packaging material types that are routinely separated or can be separated without the use of tools.
- A plastic pump dispenser with a metal spring; a paper spiral tube with metal ends; a mayonnaise tub with a tamper-evident ring; a paperboard box with a metal shearing edge; a polycoated steel can; and a plastic resin makeup compact with a metal hinge pin and tray insert are examples of packaging material types that are made up of more than one

base material that are not routinely separated or cannot be separated without the use of tools.

According to 06-096 C.M.R. ch. 428 § 4(A)(1), a **packaging material type**

> *"[…] consists of one or multiple discrete forms of packaging material with similar management requirements and similar value […]."*

Forms that routinely require disposal have similar management requirements, and forms that are not **target materials** or forms that are detrimental to recycling have similar value.

According to 06-096 C.M.R. ch. 428 § 2(DD), a **target material**

> *[…] means a base material that is used by a receiving facility to make:*
>
> *(1) Filtration media for use in a manner that does not constitute disposal, abrasive materials, glass fiber insulation, or construction materials for use in a manner that does not constitute disposal;*
>
> *(2) Smelter or furnace-ready metal;*
>
> *(3) Pulp;*
>
> *(4) Recycled plastic pellets ready for use in an extrusion or molding operation or recycled plastic flakes that do not require further processing before use in a final product; or*
>
> *(5) A commodity for sale to a market with a set of accepted materials that share the same base material.*

Examples:

- Separate packaging material types are proposed for clear, amber, and green and blue glass containers since the color of glass differs in value.
- One packaging material type is proposed for PVC (#3) and PS (#6) base materials since all forms designated as these base materials have similar management requirements.

According to 06-096 C.M.R. ch. 428 § 4(A)(1),

> *"[…] The Department may choose to have an "other" packaging material type to classify uncommon packaging material that is not readily recyclable, reusable, or compostable."*

An "other" packaging material type is proposed for each base material to classify multiple forms that are not readily recyclable.

Examples:

- Carbon black pigmented produce tubs and trays, nursery plant pots, and prepared food containers are examples of packaging materials that are detrimental to recycling and are classified within the "other" packaging material type for the respective base material.

- Packaging materials with 2 or more sides or a diameter that measures less than 2 inches, such as hang tags; closures, lids, cork stoppers, and caps; travel size hygiene product bottles; informational and instructional paper pamphlets; and measuring cups, seals, shrink wrap, and protective cotton for over-the-counter medicine bottles are examples of packaging materials that routinely require disposal and are classified within the "other" packaging material type for the respective base material.

According to 06-096 C.M.R. ch. 428 § 4(A)(2),

> *Collectively, the packaging material types must be comprehensive enough to reflect the distinctions used by participating municipalities and their affiliated contractors to manage packaging material.*

The packaging material types proposed reflect what is presently collected and supplied to the recycling markets by municipalities and their affiliated contractors.

Each packaging material type in the Packaging Material Type List must be sorted during a material audit conducted by the SO.

According to 06-096 C.M.R. ch. 428 § 4(A)(3),

> *Packaging material used to contain products that, regardless of the consumer's generator status, are hazardous in accordance with Chapter 850, Identification of Hazardous Wastes, can be classified as a distinct packaging material type.*

Examples:

- Pressurized cylinders and aerosol canisters are proposed as distinct packaging material types since they contain hazardous products, present safety concerns, and also incur additional expense for proper waste management.

Lastly, according to 06-096 C.M.R. ch. 428 § 4(A)(4),

> *Packaging material with inks or colorants, attachments or closures, polymers or resins, shapes or sizes, layers or coatings, adhesives, additives, or labels that preclude or are detrimental to recycling can be classified as a distinct packaging material type.*

Examples:

- Multi-material paper forms is proposed as a packaging material type which includes packaging material that is detrimental to recycling. A form included in this type is wet strength paper composites, such as frozen food packages and cold beverage bottle carriers.
- PET (#1) natural thermoform is proposed as a packaging material type since thermoformed packaging material precludes the plastic recycling process and results in contamination if it is included in a commodity with other forms of the same base material that are not thermoformed.

How is a packaging material type designated a base material?

According to 06-096 C.M.R. ch. 428 § 2(B), a **base material** is

> *[…] the primary material or the primary material that is targeted for recycling, as designated by the Department in accordance with Section 4(B). Base materials are glass, metal, paper, plastic by resin type, and cork/wood.*

According to 06-096 C.M.R. ch. 428 § 4(B), the **base material is**

> *[…] the material routinely targeted for recycling, or if no material is routinely targeted for recycling or if more than one material is routinely targeted for recycling, the base material is the predominant material. […]*

For a packaging material type where no material is routinely targeted for recycling, the Department identifies the predominant material as the base material.

Examples:

- The base material of a spiral paper tube with steel ends classifies as paper since no material is routinely targeted for recycling and the predominant material, by weight, is paper.
- The base material of a plastic pump dispenser with a metal spring classifies as the predominant plastic resin since no material is routinely targeted for recycling and the predominant material, by weight, is the plastic resin.

According to 06-096 C.M.R. ch. 428 § 4(B), for a packaging material type composed of more than one base material,

> *[…] the Department will identify cases where more than one material is routinely separated and targeted for recycling at recycling facilities that accept the packaging material type.*

No cases have been identified in the draft Initial Packaging Material Types List where a packaging material type with more than one material is routinely separated and targeted for recycling at recycling facilities.

How is a packaging material type designated readily recyclable?

The Department will designate a packaging material type as readily recyclable if the packaging material type is marketable, if there is sufficient throughput, and if at least 60% of the total weight of the packaging material type is targeted for recycling.

The packaging material types proposed as readily recyclable are identified in the draft Initial Packaging Material Types List included at the end of this document.

For the purpose of proposing whether a packaging material type is marketable and has sufficient throughput, the Department referenced information on reportable recyclables sent to be recycled in 2023 and 2024.

According to 06-096 C.M.R. ch. 428 § 4(C)(1), a packaging material is **marketable** if

> *[…] (a) There are at least two facilities in North America operating in accordance with applicable environmental laws that recycle the packaging material type into products that are not primarily used for fuel and are not placed into the permitted area of a landfill. Recycling processes that are inconsistent with applicable laws and conventions are examples of processes that do not safeguard the environment and human health.*
>
> *(b) Operational facilities have the capacity to recycle the packaging material type in quantities equal to, or in excess of, the amount of material collectively supplied by the market.*
>
> *(c) Its anticipated cost per ton is less than or equal to 2 times the cost per ton of managing the most expensive readily recyclable packaging material type. If the packaging material type is currently being managed for recycling by participating municipalities, its anticipated cost per ton is equal to the average cost per ton currently realized by participating municipalities. If the packaging material type is not currently being managed for recycling by participating municipalities, the Department will determine the anticipated cost per ton using input from stakeholders, information on the market value of the material, and the cost of managing other packaging material types for recycling.*

During the development of the Initial Packaging Material Types List, according to 06-096 C.M.R. ch. 428 § 5(A)(1),

> *"The criterion specified in Section 4(C)(1)(c) does not apply during the creation of the initial packaging material types list."*

The draft Initial Packaging Material Types List, if adopted by the Maine Board of Environmental Protection, will be the first version of the Packaging Material Types List. All subsequent versions of this list will be referred to as the Packaging Material Types List.

According to 06-096 C.M.R. ch. 428 § 4(C)(2), a packaging material type has **sufficient throughput** if

> *"[…] it is common enough to warrant sortation, or it can be included in a commodity used to market packaging material without increasing the contamination in that commodity."*

In the draft Initial Packaging Material Types List, a packaging material type is proposed as meeting the sufficient throughput criterion if the packaging material type:

1) Meets the marketability criterion; and
2) Constitutes a reportable recyclable in the recycling establishment report without increasing contamination of that reportable recyclable.

Material included in a reportable recyclable that is presently collected and supplied to a recycling market is considered material that is common enough to warrant sortation. However, material included in a reportable recyclable that is considered contamination or that is not a target material is not considered common enough to warrant sortation.

According to 06-096 C.M.R. ch. 428 § 4(C)(3), a packaging material type has a 3:5 **ratio of weight targeted for recycling to total weight** if

> *At least 60% of the weight of a packaging material type, on average, is composed of materials that are routinely separated and targeted for recycling at recycling facilities that accept the packaging material type.*

The draft Initial Packaging Material Types List only proposes a packaging material type as meeting the ratio of weight targeted for recycling to total weight criterion if the packaging material type meets:

1) The marketability criterion; and
2) The sufficient throughput criterion.

The packaging material types proposed to meet the marketability and the sufficient throughput criteria are additionally proposed to meet the ratio of weight targeted for recycling to total weight criterion if the packaging material type is, on average, 60% by weight of materials that are routinely separated and targeted for recycling.

How does a participating municipality provide for the collection and the recycling of readily recyclable packaging material types?

A participating municipality collecting a commingled recycling stream will meet the program requirement of providing for the collection of all the packaging material types that are readily recyclable in that stream so long as the types are included in the set of accepted materials and targeted for recycling. Packaging material types included in a set of accepted materials are not guaranteed to be recycled.

According to 06-096 C.M.R. ch. 428 § 2(BB), a **set of accepted materials** means

> *[…] materials in a packaging stream, as allowed by the receiving facility.*

A participating municipality sending a commingled recycling stream to a materials recovery facility (MRF) that includes glass containers in its set of accepted materials is considered recycled if it meets the definition of recycling, pursuant to 38 M.R.S. § 1771(7).

> *"Recycling" means the transforming or remanufacturing of an unwanted product or the unwanted product's components and by-products into usable or marketable materials. "Recycling" does not include landfill disposal, incineration or energy recovery or energy generation by means of combusting unwanted products, components and by-products with or without other waste.*

According to 06-096 C.M.R. ch. 428 § 2(L), **disposal** means

> *[…] the final disposition of material in a manner that does not constitute recycling, reuse, or composting. Disposal includes any placement of material in the permitted area of a landfill.*

Examples:

- A participating municipality can collect clear, amber, and green and blue glass containers as separate commodity streams, or a participating municipality can collect clear, amber, green and blue glass containers as a single commodity stream, both of which provide for the collection of all glass packaging material types that are proposed readily recyclable.

For reimbursement purposes, the percent composition of the packaging material types in each stream, with a different set of accepted materials, will be determined by material audits conducted by the SO.

How is a packaging material type designated reusable or compostable?

In addition to a packaging material type being designated readily recyclable, the Department may further designate a packaging material type as reusable or compostable. According to 06-096 C.M.R. ch. 428 § 2(Z), **reusable packaging material** is

> *[…] packaging material that is designed to be reused and the reuse of which is facilitated by an alternative collection program collecting the reusable packaging material in every county in which it is produced.*

At this time, no packaging material types are proposed to have a reusable designation.

According to 06-096 C.M.R. ch. 428 § 2(G), **compostable packaging material** is

> *[…] packaging material that is designed for direct food contact and is capable of undergoing composting as shown by third-party certifications to ASTM D6400, ASTM D6868, and ASTM D8410.*

At this time, no packaging material types are proposed to have a compostable designation.

What is the process for reviewing the Packaging Material Types List?

According to 06-096 C.M.R. ch. 428 § 5(B), *Annual Review of the Packaging Material Types List,* the SO will provide an ongoing mechanism that allows it to collect input from stakeholders regarding the Packaging Material Types List. In its annual report to the Department, the SO must identify any packaging material types that might be newly defined, redefined, or redesignated. The Department will share the SO's annual report and accept comments in response to the suggested changes for a period of 30 days. The Department will then review input from the SO

and comments received on the Packaging Material Types List and initiate rulemaking to make adjustments, as necessary.

Base Material	Packaging Material Type	Description	Marketability	Throughput	Ratio	Readily Recyclable	Reusable	Compostable
Glass	Clear glass containers		meets criterion			Y	N	N
Glass	Amber glass containers					Y	N	N
Glass	Green and blue glass containers					Y	N	N
Glass	Other glass forms	Any glass forms not captured in the glass packaging material types listed herein; all forms made of ceramic, porcelain, or borosilicate glass; and glass forms with 2 or more sides or a diameter that measures less than 2 inches.	does not meet criterion			N	N	N
Metal	Aluminum forms	Cans, containers, closures, and lids.				Y	N	N
Metal	Molded and pressed aluminum forms	Foils, plates, sheets, and trays.				N	N	N
Metal	Aluminum aerosol containers	An aluminum non-refillable receptacle containing a propellent serving to eject the product from the receptacle.				N	N	N
Metal	Aluminum pressurized cylinders	An aluminum receptacle containing compressed gas, such as seamless cylinders and tubes, welded cylinders and insulated cylinders.				N	N	N
Metal	Other aluminum forms	Any aluminum forms that are not captured in the aluminum packaging material types listed herein; and aluminum forms with 2 or more sides or a diameter that measures less than 2 inches.				N	N	N
Metal	Tin/steel forms	Cans, containers, closures, and lids.				Y	N	N
Metal	Tin/steel aerosol containers	An tin or steel non-refillable receptacle containing a propellent serving to eject the product from the receptacle.				N	N	N
Metal	Tin/steel pressurized cylinders	A tin or steel receptacle containing compressed gas, such as seamless cylinders and tubes, welded cylinders and insulated cylinders.						
Metal	Other tin/steel forms	Any tin or steel forms that are not captured in the tin/steel packaging material types listed herein; and tin or steel forms with 2 or more sides or a diameter that measures less than 2 inches.				N	N	N
Paper	Molded pulp forms	All forms made of molded pulp paper.				N	N	N
Paper	Corrugated cardboard	Cardboard that is not coated with clay, varnish, wax, or a polymer barrier.				Y	N	N
Paper	Coated corrugated cardboard	Cardboard that is coated with clay, varnish, or a polymer barrier.				Y	N	N
Paper	Coated paper forms	Bleached and unbleached paperboard, boxboard, chipboard, containerboard, linerboard, and paper that is coated with a layer of clay, varnish, or a polymer barrier. This includes gable-top cartons and polycoated cups.				Y	N	N
Paper	Uncoated paper forms	Bleached and unbleached paperboard, boxboard, chipboard, containerboard, linerboard, and paper that is not coated with a layer clay, varnish, wax, or a polymer barrier.				Y	N	N
Paper	Multi-material paper forms	Bleached and unbleached paper forms made of multiple, fused layers using paper, laminated foils, stamped foils, metalized foils, or polymers; or paper composites. This includes aspetic cartons, spiral paper tubes with metal ends, foam padded paper forms, and wet-strength paper composites, such as carriers and frozen food boxes.				N	N	N
Paper	Other paper forms	Any paper form not captured in the paper packaging material types listed herein; wax-coated corrugated cardboard and paper forms; and paper forms with two or more sides or a diameter measuring less than 2 inches.				N	N	N
Wood/cork	Untreated wood/cork forms	All forms made of wood or cork that are not treated.				N	N	N
Wood/cork	Wood/cork textile forms	A textile form made of nonsynthetic fibers, such as wood, cork, bamboo, bagasse, cotton, or eucalyptus, made into a cloth or woven fabric.				N	N	N
Wood/cork	Other wood/cork forms	Any wood, cork, or nonsynthetic fiber forms that are not captured in the wood/cork packaging material types listed herein; all types made of wood or cork that are treated; wood or cork forms with 2 or more sides or a diameter measuring less than 2 inches.				N	N	N
PET (#1)	PET (#1) natural forms	A non-pigemented PET (#1) bottle, jug, tub, closure, lid, or form that is not thermoformed.				N	N	N
PET (#1)	PET (#1) colored forms	A pigmented, excluding carbon black, PET (#1) bottle, jug, tub, closure, lid, or form that is not thermoformed.				N	N	N
PET (#1)	PET (#1) bulky forms	A pigmented, excluding carbon black, or non-pigmented PET (#1) rigid form with 2 or more sides or a diameter measuring more than 12 inches.				N	N	N
PET (#1)	PET (#1) natural thermoforms	A non-pigmented PET (#1) form that is thermoformed.				N	N	N
PET (#1)	PET (#1) flexible and film forms	A mono-material PET (#1) form that is a flexible or a film.				N	N	N
PET (#1)	Other PET (#1) forms	Any PET (#1) forms not captured in the PET (#1) packaging material types listed herein; PET (#1) forms with 2 or more sides or a diameter measuring less than 2 inches; PET (#1) colored thermoforms; and all PET (#1) forms pigmented with carbon black.				N	N	N
HDPE (#2)	HDPE (#2) natural forms	A non-pigmented HDPE (#2) bottle, jug, tub, closure, or lid.				Y	N	N
HDPE (#2)	HDPE (#2) colored forms	A pigmented, excluding carbon black, HDPE (#2) bottle, jug, tub, clsoure, or lid.				Y	N	N

HDPE (#2)	HDPE (#2) bulky forms	A pigmented, excluding carbon black, or non-pigmented HDPE (#2) rigid form with 2 or more sides or a diameter measuring more than 12 inches.				N	N	N
HDPE (#2)	HDPE (#2) flexible and film forms	A mono-material HDPE (#2) form that is a flexible or a film.				N	N	N
HDPE (#2)	Other (#2) HDPE forms	Any HDPE (#2) forms not captured in the HDPE (#2) packaging material types listed herein; HDPE (#2) forms with 2 or more sides or a diameter that measures less than 2 inches; and all HDPE (#2) forms pigmented with carbon black.				N	N	N
PVC (#3)	PVC (#3) forms	All PVC (#3) forms.				N	N	N
LDPE (#4)	LDPE (#4) natural forms	A non-pigmented LDPE (#4) bottle, jug, tub, closure, or lid.				N	N	N
LDPE (#4)	LDPE (#4) colored forms	A pigmented, excluding carbon black, LDPE (#4) bottle, jug, tub, closure, or lid.				N	N	N
LDPE (#4)	LDPE (#4) bulky forms	A pigmented, excluding carbon black, or non-pigmented LDPE (#4) rigid form with 2 or more sides or a diameter measuring more than 12 inches.				N	N	N
LDPE (#4)	LDPE (#4) flexible and film forms	A mono-material LDPE (#4) form that is a flexible or a film.				N	N	N
LDPE (#4)	Other LDPE (#4) forms	Any LDPE (#4) forms not captured in the LDPE (#4) packaging material types listed herein; any LDPE (#4) forms with 2 or more sides or a diameter that measures less than 2 inches; and all LDPE (#4) forms pigmented with carbon black.				N	N	N
PP (#5)	PP (#5) natural forms	A non-pigmented PP (#5) bottle, jug, tub, closure, or lid.				N	N	N
PP (#5)	PP (#5) colored forms	A pigmented, excluding carbon black, bottle, jug, tub, closure, or lid.				N	N	N
PP (#5)	PP (#5) bulky forms	A pigmented, excluding carbon black, or non-pigmented PP (#5) rigid form with 2 or more sides or a diameter measuring more than 12 inches.				N	N	N
PP (#5)	PP (#5) flexible and film forms	A mono-material PP (#5) that is a flexible or a film.				N	N	N
PP (#5)	Other PP (#5) forms	Any PP (#5) forms not captured in the PP (#5) packaging material types listed herein; any PP (#5) forms with 2 or more sides or a diameter that measures less than 2 inches; and all PP (#5) forms pigmented with carbon black.				N	N	N
PS (#6)	PS (#6) forms	All PS (#6) forms.				N	N	N
Mixed resin (#7)	Mixed resin (#7) composite forms	All sizes of pigmented and unpigmented mixed resin (#7) rigid, flexible, and film forms made of 2 or more plastic resins, such as polycarbonates, polylactic acids, acrylonitrile butadiene styrene (ABS), and carbon fiber, excluding pressurized cylinders.				N	N	N
Mixed resin (#7)	Mixed resin (#7) multi-material laminate forms	All sizes of mixed resin (#7) multi-material laminate forms made of multiple, fused layers using 2 or more plastic resins, laminated foils, stamped foils, or metalized foils, such as wrappers, pouches, and other flexibles.				N	N	N
Mixed resin (#7)	Mixed resin (#7) textile forms	All sizes of textile forms made of synthetic fibers, such as acrylic, melamine, polyester, and nylon, made into a cloth, woven fabric, or netting.				N	N	N
Mixed resin (#7)	Mixed resin (#7) pressurized cylinders	A mixed resin (#7) receptacle containing compressed gas, such as seamless cylinders and tubes, welded cylinders, and insulated cylinders. This includes carbon fiber pressurized cylinders.				N	N	N